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FINAL RENO GRAZING ENVIRONMENTAL IMPACT STATEMENT

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U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
CARSON CITY DISTRICT, NEVADA

Preface

The final Reno Grazing Environmental Impact Statement (FEIS) has been printed in an abbreviated format consistent with the National Environmental Policy Act Regulations. This FEIS must be used in conjunction with the Draft Environmental Statement (INT DEIS 82-43). The FEIS includes a summary of the DEIS, an errata of the DEIS by chapter, written comments received during the public review process, substantive comments presented at public hearings, and responses to those comments.

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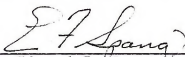
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FINAL
ENVIRONMENTAL IMPACT STATEMENT

Proposed Domestic Livestock Grazing Management Program
for the
Reno Environmental Impact Statement Area
Nevada

Prepared by
Department of the Interior
Bureau of Land Management
Carson City District


Edward F. Spang
State Director
Nevada State Office

The Bureau of Land Management proposes to implement a livestock grazing management program for the Reno Environmental Impact Statement (EIS) area of the Carson City District in Western Nevada. This program proposes certain management actions to solve similar problems associated with specific allotments through a selective management system. These actions consider utilization levels for livestock, mule deer and wild horses; needed range improvements and land treatments; a general implementation scheme; standard operating procedures, and the interrelationships with other programs in the area. Three alternatives, No Action, Maximization of Livestock and Resource Protection were considered along with the Proposed Action. A discussion of the affected environment and the environmental consequences occurring from the alternatives including the Proposed Action is also documented in the EIS.

For Further Information Contact:
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Carson City, Nevada 89701

Date Final EIS was made available to the Environmental Protection Agency and the public:

SEP 30 1982

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1. The first part of the paper discusses the importance of the study of the history of the United States. It is argued that a knowledge of the past is essential for a full understanding of the present and for the development of a sound policy for the future.

2. The second part of the paper discusses the importance of the study of the history of the United States. It is argued that a knowledge of the past is essential for a full understanding of the present and for the development of a sound policy for the future.

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PURPOSE AND NEED FOR ACTION

The purpose of the Reno Grazing Environmental Impact Statement (EIS) is to analyze the potential environmental impacts of implementing a grazing management program in the EIS area. This EIS is being prepared in compliance with section 102(2)C of the National Environmental Policy Act (NEPA) of 1969. It will follow guidance as outlined in the Council on Environmental Quality (CEQ) regulations of November 29, 1978.

An EIS was deemed necessary by the Bureau of Land Management (BLM) as a result of a 1973 suit filed in federal court by the Natural Resources Defense Council (NRDC) stating that the BLM's programmatic grazing EIS approach was not adequate and did not comply with NEPA.

In addition to the Proposed Action, three alternatives are being analyzed in the EIS. They are: No Action, Maximization of Livestock, and Resource Protection. An alternative considered but eliminated from study was No Livestock Grazing. This alternative was eliminated because it was considered to be unreasonable and unrealistic per Nevada Instruction Memorandum NV-82-61.

SUMMARY

ALTERNATIVES INCLUDING THE PROPOSED ACTION

The Bureau of Land Management (BLM) proposes to implement a livestock grazing management program in the Reno Environmental Impact Statement (EIS) area of the Carson City District.

The Reno EIS area consists of approximately 699,481 acres of public land located in southwestern Nevada (EIS Area Map). Interspersed throughout the EIS area are various acres of private, state, and other lands. Also, the Toiyabe National Forest and the Plumas National Forest in California share boundaries with part of the EIS area.

Components of the alternatives including the proposed action include: (1) Vegetation Utilization (Summary Table 1), (2) Levels of Grazing Management (Summary Table 2) and, (3) Range Improvements and Land Treatments (Summary Table 3). Summary Table 4 compares the impacts of each resource as they relate to a given alternative. Also involved in each alternative, including the proposed action, is Coordinated Resource Management and Planning (CRMP) which is the method by which the Bureau's publics can get involved in the decision making process of land use planning. In part, the CRMP process will help establish vegetation utilization levels, implementation schedules, periods-of-use, etc.

Analysis of the alternatives, including the proposed action, has determined that there would be no significant impacts to visual resources, cultural resources, water quantity, threatened and endangered species, areas of critical environmental concern, wilderness and climate. This is due to

either standard operating procedures or to impacts not exceeding a predetermined level of significance.

AREAS OF CONTROVERSY

Public contacts have been made with interest groups, local and state governments, other federal agencies, and numerous individuals to determine the areas of concern with the proposed grazing management program for the Reno EIS area.

The main area of controversy involved the initial adjustments in livestock, wild horse and mule deer use based on completed range inventory information. Upon completion of the range survey, an analysis of the final calculated data indicated some inconsistency in vegetation production between areas of similar type vegetation with similar species composition and cover. Therefore, forage production data derived from the survey was not used for determining carrying capacity for individual allotments (Appendix E).

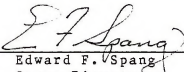
Other data derived from the survey, including range site potential information is, however, used as a basis for analyzing vegetation impacts (Appendix D).

Future adjustments in use would be made over a five year period using a combination of monitoring information and inventory data and would begin immediately following completion of the EIS. Adjustments in use would first begin within those allotments where studies and inventory information indicate poor ecological condition, downward trend and excessive utilization above carrying capacity.

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SUMMARY TABLE 2
PROPOSED LEVELS OF GRAZING MANAGEMENT

<u>Type of Action</u>	<u>CATEGORY a/</u>					
	<u>M</u>		<u>I</u>		<u>C</u>	
	<u>Allot.</u>	<u>Acres</u>	<u>Allot.</u>	<u>Acres</u>	<u>Allot.</u>	<u>Acres</u>
Proposed Action	10	43,798	10	434,100	35	221,583
No Action Alt.	0		0		0	
Max. of Livestock Alt.	10	43,798	10	434,100	35	221,583
Resource Protection Alt.	10	43,798	21	551,325	24	104,358

a/ The grouping of allotments into Category M, I and C is not the proposed action. Rather the proposed action under a given alternative is the management action involved with correcting problems associated with a given group of allotments.

SUMMARY TABLE 3
POTENTIAL RANGE IMPROVEMENTS AND LAND TREATMENTS
BY ALTERNATIVE

	<u>PROPOSED ACTION</u>	<u>NO ACTION</u>	<u>MAXIMIZATION OF LIVESTOCK</u>	<u>RESOURCE PROTECTION</u>
<u>RANGE IMPROVEMENTS</u>				
Fences	105 mi.	0	187 mi.	113 mi.
Troughs	95 ea.	0	95 ea.	124 ea.
Spring Boxes	41 ea.	0	41 ea.	55 ea.
Gabions	15 ea.	0	15 ea.	15 ea.
Culverts	3 ea.	0	3 ea.	3 ea.
Wells	1 ea.	0	1 ea.	1 ea.
Springs	8 ea.	0	8 ea.	8 ea.
Pipelines	2 mi.	0	2 mi.	2 mi.
Fence Removal	12 mi.	0	12 mi.	12 mi.
Cattleguards	8 ea.	0	8 ea.	8 ea.
<u>LAND TREATMENTS</u>				
Sagebrush Control and Seedings	6,655 ac.	0	13,313 ac.	6,655 ac.
Estimated Cost (Dollars)	\$821,050	0	\$1,440,950	\$867,050

SUMMARY TABLE 4
SUMMARY COMPARISON OF IMPACTS
RENO EIS AREA

PROPOSED ACTION	NO ACTION	MAXIMIZING LIVESTOCK	RESOURCE PROTECTION
<u>SOILS</u>			
Those allotments in Category M and C will show no significant change in current erosion, flooding and sediment damage.	Continued accelerated erosion rate and subsequent soil loss.	Same as No Action.	Same as Proposed Action.
Those allotments in Category I will show a significant decrease in erosion, flooding and sedimentation in riparian habitat and critical watershed areas.	Continued increase in flooding and sedimentation damage in unprotected riparian habitat and critical watershed areas.		
<u>WATER QUALITY</u>			
Waters located in Category M and C allotments will show little change in water quality.	Those streams currently exceeding water quality standards and those streams not exceeding the standards will show degraded quality over time.	Same as No Action.	Same as Proposed Action.
Those allotments in Category I will have significant improvement in water quality due to intensive management, range improvements, and riparian habitat protection.			

SUMMARY TABLE 4
SUMMARY COMPARISON OF IMPACTS
RENO EIS AREA

PROPOSED ACTION	NO ACTION	MAXIMIZING LIVESTOCK	RESOURCE PROTECTION
<u>VEGETATION</u>			
CATEGORY I ALLOTMENTS	ALL ALLOTMENTS	CATEGORY I ALLOTMENTS	CATEGORY I ALLOTMENTS
Ecological Condition (Native Range)	Ecological Condition (Native Range)	Ecological Condition (Native Range)	Ecological Condition (Native Range)
1% increase (3,017 acres) in excellent condition	<1% increase (3 acres) in excellent condition	1% increase (2,991 acres) in excellent condition	1% increase (3,994 acres) in excellent condition
4% increase (28,448 acres) in good condition	<1% decrease (4,048 acres) in good condition	4% increase (27,837 acres) in good condition	5% increase (33,934 acres) in good condition
2% decrease (12,687 acres) in fair condition	2% decrease (13,584 acres) in fair condition	2% decrease (12,476 acres) in fair condition	2% decrease (11,752 acres) in fair condition
3% decrease (18,778 acres) in poor condition	3% increase (17,899 acres) in poor condition	3% decrease (18,352 acres) in poor condition	4% decrease (26,203 acres) in poor condition
Forage Condition (seedings)	Forage Condition (seedings)	Forage Condition (seedings)	Forage Condition (seedings)
No increase (15 acres) in excellent condition	No increase in excellent condition	Same as Proposed Action	2% increase (207 acres) in excellent condition
4% increase (374 acres) in good condition	2% increase (180 acres) in good condition		3% increase (299 acres) in good condition
3% decrease (289 acres) in fair condition	2% increase (162 acres) in fair condition		3% decrease (352 acres) in fair condition
1% decrease (100 acres) in poor condition	<1% decrease (18 acres) in poor condition		2% decrease (154 acres) in poor condition

SUMMARY TABLE 4
SUMMARY COMPARISON OF IMPACTS
RENO EIS AREA

PROPOSED ACTION	NO ACTION	MAXIMIZING LIVESTOCK	RESOURCE PROTECTION
VEGETATION (cont.)			
Ecological Condition (Riparian Habitat)	Ecological Condition (Riparian Habitat)	Ecological Condition (Riparian Habitat)	Ecological Condition (Riparian Habitat)
1% increase in excellent condition	No increase in excellent or good conditions	Same as Proposed Action	Same as Proposed Action
10% increase in good condition	4% increase in fair and poor condition	(Aspen Habitat)	(Aspen Habitat)
3% decrease in fair condition	(Aspen Habitat)	Same as Proposed Action	Same as Proposed Action
8% decrease in poor condition	2% increase in poor condition	Upward trend increase from 43,649 acres to 415,315 acres in Category I Allotments	Upward trend will increase from 43,649 to 551,916 acres in Category I Allotments
(Aspen Habitat)	Continued downward trend		
1% increase in excellent condition			
3% increase in good condition			
2% increase in fair condition			
6% decrease in poor condition			
Upward trend increase from 43,649 acres to 458,964 acres in Category I Allotments			

SUMMARY TABLE 4
SUMMARY COMPARISON OF IMPACTS
RENO EIS AREA

PROPOSED ACTION	NO ACTION	MAXIMIZING LIVESTOCK	RESOURCE PROTECTION
<u>WILDLIFE</u>			
<u>Short-Term</u>	<u>Short-Term</u>	<u>Short-Term</u>	<u>Short-Term</u>
Mule deer demand is 14,255 AUMs.	Same as Proposed Action.	Same as Proposed Action.	Same as Proposed Action.
No increase in mule deer, sage grouse, chukar or nongame bird numbers.	<u>Long-Term</u> Mule deer numbers would eventually decline.	<u>Long-Term</u> Mule deer demand would increase from 14,255 AUMs to 19,010 AUMs.	<u>Long-Term</u> Mule deer demand would be as in maximizing livestock.
<u>Long-Term</u> Mule deer demand increases from 14,255 AUMs to 18,401 AUMs.	Sage grouse populations would eventually decline.	Sage grouse would be as in the Proposed Action.	100% increase in sage grouse numbers.
50% increase in sage grouse numbers.	Chukar population would not be affected except by climatic condition.	Chukar would be as in the Proposed Action.	Chukar population would remain static or increase slightly.
Slight increase in chukar numbers.	Overall decline in nongame bird populations.	Nongame birds would be as in No Action.	Nongame bird numbers would be as in the Proposed Action.
Slight increase in nongame bird numbers.			

SUMMARY TABLE 4
SUMMARY COMPARISON OF IMPACTS
RENO EIS AREA

PROPOSED ACTION	NO ACTION	MAXIMIZING LIVESTOCK	RESOURCE PROTECTION
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WILD HORSES

Wild horse demand will be reduced from 16,207 AUMs to 10,325 AUMs due to removal from Indian and private lands.

Wild horse herds would eventually be reduced due to continued loss of vegetation through continued over-utilization.

Wild horse demand would be the same as under the Proposed Action.

All wild horses would be removed from the EIS area.

Wild horses would be significantly reduced in the EIS area from demand of 16,207 to 10,013 AUMs.

SUMMARY TABLE 4
SUMMARY COMPARISON OF IMPACTS
RENO EIS AREA

PROPOSED ACTION	NO ACTION	MAXIMIZING LIVESTOCK	RESOURCE PROTECTION
<u>RECREATION</u>			
Recreational hunting, fishing and wildlife viewing would be enhanced over the long term as mule deer, sage grouse, chukar, and nongame bird numbers would increase.	Mule deer numbers would not meet hunting demand.	There would be no viewing opportunities of wild horses.	Similar to the Proposed Action.
Mule deer numbers would not meet hunting demand.	There would be no construction of range improvements or seedings to form barriers or prohibit non-motorized recreation opportunities.	Mule deer, sage grouse and chukar numbers would increase over the long term which would enhance hunting opportunities.	
Fencing riparian habitat could present a barrier to movement on horseback or by foot.		Fencing and seedings would cover problems as in the Proposed Action.	
A loss of undeveloped non-motorized recreation opportunities due to proposed range improvements and seedings.			

SUMMARY TABLE 4
SUMMARY COMPARISON OF IMPACTS
RENO EIS AREA

PROPOSED ACTION	NO ACTION	MAXIMIZING LIVESTOCK	RESOURCE PROTECTION
<u>LIVESTOCK GRAZING</u>			
Utilization Summary (See Summary Table 1)	Utilization Summary (See Summary Table 1)	Utilization Summary (See Summary Table 1)	Utilization Summary (See Summary Table 1)
Increased calf and lamb crops, and higher weaning weights.	Reduced calf and lamb crop percentages and lower weaning weights. Increase in death loss, decrease in income.	Increase in calf and lamb crops and higher weaning weights.	Increase in calf and lamb crops and higher weaning weights.

SUMMARY TABLE 4
SUMMARY COMPARISON OF IMPACTS
RENO EIS AREA

PROPOSED ACTION	NO ACTION	MAXIMIZING LIVESTOCK	RESOURCE PROTECTION
<u>ECONOMICS</u>			
<u>Short Term</u>	<u>Short Term</u>	<u>Short Term</u>	<u>Short Term</u>
Regional Earnings - \$650,000	0	- \$450,000	- \$750,000
Regional Employment - 45	0	- 30	- 50
<u>Long Term</u>	<u>Long Term</u>	<u>Long Term</u>	<u>Long Term</u>
Regional Earnings - \$550,000	- \$1,000,000	+ \$700,000	- \$200,000
Regional Employment - 35	- 70	+ 50	- 30

SUMMARY TABLE 4
SUMMARY COMPARISON OF IMPACTS
RENO EIS AREA

PROPOSED ACTION	NO ACTION	MAXIMIZING LIVESTOCK	RESOURCE PROTECTION
<u>SOCIOLOGY</u>			
<u>Ranching Community</u>	<u>Ranching Community</u>	<u>Ranching Community</u>	<u>Ranching Community</u>
The concept of CRMP was favorably accepted. All ranchers viewed this process as beneficial to their operations.	The reaction was positive to the concept of No Action. There was negative reaction to the concept of no new range improvements.	Favorably received.	Possible initial adjustments in livestock numbers not entirely accepted.
All ranchers felt that wild horses should be reduced.			
Most ranchers viewed monitoring as a productive tool but some expressed concern that reduction in livestock might result.			
<u>State and National</u>	<u>State and National</u>	<u>State and National</u>	<u>State and National</u>
Personal interviews indicated that the Proposed Action would result in continued deterioration of the rangelands as there is too much emphasis on the livestock industry.	Same as Proposed Action.	Highly negative impacts as this could result in extreme deterioration of the rangeland.	Wild horse groups feel this is a deterrent to opportunities to view wild horses. Favorable to wildlife and recreation groups.

ERRATA

SUMMARY

In Summary Table 1, footnote a/ was changed to read...(including 840 AUMs not within the EIS area but part of a herd unit)...

Summary Table 4, page IX
Vegetation

1) "Category I Allotments" should read "All Allotments"

2) No Action column "13,584" should read "13,854" and "2% increase (162 acres)" should read "2% decrease (162 acres)"

3) Resource Protection column "2% decrease (11,752 acres)" should read "2% decrease (11,725 acres)"

4) General notice: The shift in acres from one ecological condition class to another for the Proposed Action, Maximization of Livestock and Resource Protection Alternatives was calculated after the acres of proposed seedings* were subtracted from the acres presently in fair and poor ecological condition. * 6655 acres for the Proposed Action and Resource Protection alternatives and 13,313 acres for the Maximization of Livestock alternative.

CHAPTER 1

In Table 1-1, footnote d/ should read: "Categorical ranking applies to all alternatives except No Action."

Table 1-2 on page 1-5; Reasonable Numbers (AUMs) for Constantia Allotment should be 2023.

Table 1-3 on page 1-6 and Table 1-8 on page 1-14 are changed to show cost/unit of fence as \$3,500; water trough \$500.

CHAPTER 2

Under Flood And Sediment Damage, Page 2-1, the second paragraph, first sentence should be followed with the reference...(Flood and Sediment Damage Map).

The second sentence of paragraph 9 on page 2-2 should be replaced with "this value reflects the additional capacity that public land grazing allotments provide to base property and is a result of grazing fees that have historically been less than market value (Nielson and Workman, 1971).

Table 2-4 on page 2-10 is changed to show upward trend on the Bagley Valley allotment.

Page 2-9, left column, paragraph 2 "D22-995 Aspen Slopes" should read "D22-995 Aspen Slopes 20-24 pz".

Page 2-13 under heading of Mule Deer, second paragraph of section, the last sentence should read...the number of deer using each allotment, as numbers data...(omit the word type).

CHAPTER 3

Page 3-2 paragraph 4, General note: The shift in acres from one ecological condition class to another for the Proposed Action was calculated after 6,655 acres of proposed seedings were subtracted from the acres presently in fair and poor ecological condition.

Page 3-3, right column, last paragraph "Eckert, 1980" should read "Eckert, 1981".

Under Economic Impacts, page 3-7, paragraph 4 of the right column

TABLE 1-7B
RESOURCE PROTECTION ALTERNATIVE
ORIGINAL ALLOTMENTS
RENO EIS AREA

ALLOTMENT	CATEGORY	PROPOSED PERIOD-OF-USE ^{a/}	LAST THREE YEARS AVERAGE USE (AUMs)	ADJUSTED LIVESTOCK USE ^{b/} (AUMs)	MULE DEER REASONABLE NUMBERS ^{c/} (AUMs)	WILD HORSE NUMBERS ^{d/} (AUMs)
Winemucca Ranch ^{a/}	I	Year Long	7,503	3,070	2,047	
Flanigan		05-15 to 03-15	5,017	3,306	305	4,308
Churchill Canyon		04-01 to 07-15	2,823	1,733	256	1,214
Pinenut		06-01 to 09-30	542	590	285	489
		11-01 to 11-30				
Sunrise		05-01 to 09-30	Non-use	(641) ^{h/}	471	345
Buckeye ^{f/}		03-01 to 11-15	4,550	3,889	345	1,008
Palute Canyon ^{g/}		05-15 to 03-15	4,511	3,039	1,601	96
Big Canyon		05-15 to 03-15	2,776	1,920	399	
Constantia		05-15 to 11-15	1,036	0	1,439	
Antelope Mountain		05-15 to 11-15	3,103	2,925	2,500	432
TOTAL			31,861	21,113	9,648	7,892

^{a/} These turn out dates are shown for analytical purposes.

^{b/} Livestock use is based on existing range utilization study information.

^{c/} As additional vegetation becomes available over the long term the available AUMs for mule deer could exceed reasonable numbers in a given allotment.

^{d/} These are estimated numbers.

^{e/} Includes temporary license. Period-of-use dependent on success of seedlings.

^{f/} Buckeye Allotment Includes Fish Springs Allotment.

^{g/} Palute Canyon Allotment Includes Hungry Valley and Shovel Springs Allotments.

^{h/} This is currently in non-use status but is included in the total.

Source: US Department of the Interior, Bureau of Land Management, Carson City District, Grazing License Files and Unit Resource Analysis, 1980.

the last sentence should be followed by...There would still be a decrease of about 15 jobs in the ranch sector from the current level.

Under Economic Impacts, page 3-7, paragraph 5 of the right column, the first sentence will replace the figure \$24,000 with... \$550,000 from the current level.

Page 3-14, paragraph 4, General note: The shift in acres from one ecological condition class to another for the Maximization of Livestock alternative was calculated after 13,313 acres of proposed seedings were subtracted from three acres presently in fair and poor ecological condition.

Page 3-19, right column, paragraph 2, "a decrease of 11,752 acres in fair condition..." should read, " a decrease of 11,725 acres in fair condition".

Page 3-19, right column, paragraph 2, General note: The shift in acres from one ecological condition class to another for the Resource Protection alternative was calculated after 6,655 acres of proposed seedings were subtracted from the acres presently in fair and poor ecological condition.

APPENDIX C

Section 1

Page 5-17, Table 2-4, 2) "...BLM Manual Section 4430" should read"...BLM Manual Section 4412".

Page 5-17, Table 2-3, "As in Table 2-3, all data was summarized..." should read, "As in Table 2-4, all data was summarized."

APPENDIX E

Section 2

Page 5-28, paragraph 3, "the percents of acres shifting from one condition class to another were estimated for the No Action alternative..." should read "the percents of acres shifting from one condition class to another were estimated for all alternatives..."

Page 5-28, paragraph 4, "Table 3-1 of Appendix C," should read "Table 2-1 of Appendix C,"

Page 5-38, a/ See Appendix "E, Section 2" for explanation of defining characteristics

APPENDIX F

Page 5-42, 6) B) right column, "enter in column 4, section A...1,957 acres in poor condition (456 plus 1,508)" should read "1,957 acres in poor condition (456 plus 1,501)".

Page 5-42, right column, last paragraph, "Tables 1-1, 1-3, 1-5, and 1-7, Appendix F, Section 1..." should read "Tables 1-1, 1-3, 1-5, and 1-7, Appendix F..."

Page 5-44, Table 1-1, Bagley Valley trend should be up.

Page 5-45, Table 1-1, Koch Ditch should read 84 acres in poor condition at five years (note the 84 slipped to a lower line.

Page 5-48, Table 1-3, Bagley Valley trend should be up.

Page 5-49, Table 1-3

Barney Riley, not Antelope Mountain, should read 3 acres in excellent condition at ten years.

Dry Lake should read 201 in good condition at ten years, not 210.

Total acres in good condition at ten years should read 46,725, not 46,734

Page 5-52, Table 1-5, Bagley Valley trend should be up.

Page 5-53, Table 1-5, Koch Ditch, not Luther Creek, should read 84 acres in poor condition at five years (note the 84 slipped to a lower line).

Page 5-56, Table 1-5, Bagley Valley trend should be up.

Page 5-58, Table 1-8 Ecological Condition, Fair column; "11,752" should read 11,725.

Ecological Condition, Excellent column; should include 1% up.

APPENDIX G

Section 1

Page 5-61, Table 1, Juniper Savannah 10-12" pz, 26-17
"fair condition"

2.91
4.69
<u>7.60</u>
(weighted average"
Ac/AUM)

Should read,

"fair condition"

2.91
4.70
<u>7.61</u>
(weight average"
Ac/AUM)

Section 2

Page 5-62, Step 2, "Acres in each ecological condition class (from EIS 3-1, Column 4, Section A; Appendix F, Section 1)" should

read "Acres in each ecological condition class (e.g., Figure 1-4, Column 4, line 2 in Appendix F)".

Page 5-62, delete "as described in Appendix F, Section 1."

APPENDIX K

SPECIFIC CRITERIA FOR GROUPING ALLOTMENTS INTO SELECTIVE MANAGEMENT CATEGORIES

CATEGORY M: (Maintenance)

1. Present range ecological condition is satisfactory and/or improving.
2. Present management is satisfactory.
3. Allotment is producing at or near its potential for vegetation production.
4. There are no or very limited land use conflicts.
5. Public lands may be widely scattered or their total acreage so small as to make intensive management or improvements economically unsound.
6. Range improvements may have already been completed or are unnecessary.

All or some of the above criteria will be used to determine category M status.

ADD:

Ecological condition ratings (poor, fair, good, excellent) are based on actual plant species and abundance of species at the present time as compared to climax or pristine conditions prior to human impact. Plant succession towards climax or excellent ecological condition does not necessarily reflect quality of plant life for specific uses.

The Range Inventory Standardization Committee (1980) of the Society for Range Management has proposed replacing range condition with two other ratings. The first would recognize the ecological status of plant communities with the climax or potential natural vegetation as the base. The second would be oriented toward use by cattle, wildlife, watershed, recreation and so on, and would rate ecological stages by value relative to specific uses.

PUBLIC PARTICIPATION

CONSULTATION AND COORDINATION

News releases announcing the Bureau of Land Management's plans to prepare a Grazing Environmental Impact Statement (EIS) for the Reno EIS area were issued in June, 1981. The formal Notice of Intent to prepare the EIS was published in the Federal Register of May 1981.

During the preparation of the Draft Environmental Impact Statement (DEIS), other federal offices, state and local agencies, interest groups and individuals were contacted. Communications varied from formal written correspondence to informal personal contact and telephone calls. Information concerning the proposed action and the Carson City District's preparation of this document was made available to local, regional and statewide media.

During April, May and June of 1981, range permittees with livestock grazing preferences in the Reno EIS area were contacted by the BLM. Discussion centered on social values, attitudes and economic perspectives regarding ranching and grazing on public lands (Appendix L and M DEIS).

This information was used as a basis to analyze the economic and social impacts of the alternatives including the proposed action.

SCOPING PROCESS

The identification or "scoping" of issues addressed in the Reno Grazing EIS was conducted through public meetings on June 30 and July 1, 1981. The Carson City District contacted interested individuals, groups and other

agencies concerning the preparation of the Reno Grazing Environmental Impact Statement. Letters of invitation were sent to individuals, groups and agencies and news releases were issued to the local and state news media soliciting public input.

Representatives from the Carson City District Office of the BLM discussed the EIS process in a meeting with the Nevada State Clearinghouse on June 30, 1981.

Also, Carson City District personnel met with Resource Concepts, acting on behalf of the Nevada Cattlemen's Association, to discuss the economic analysis for the Reno EIS.

INTERAGENCY CONTACTS

Professional contacts have been made with the Nevada Department of Wildlife (NDOW)*, Fish and Wildlife Service (F&WS)*, Soils Conservation Service (SCS), Forest Service (FS) and Bureau of Indian Affairs (BIA).

COORDINATION IN THE REVIEW OF THE ENVIRONMENTAL IMPACT STATEMENT

Requests for comments on the DEIS were made of the following interest groups and agencies:

CONGRESSIONAL

Senator Howard Cannon
Senator Paul Laxalt
Congressman James Santini

FEDERAL AGENCIES

Department of Agriculture
Agricultural Stabilization and Conservation Service, Reno U.S.
Forest Service, Toiyabe National Forest

Soil Conservation Service, Reno
Department of Interior
Bureau of Indian Affairs,
Stewart Nevada
Bureau of Mines, Reno
Fish and Wildlife Service*,
Washington, D.C.
Geological Survey, Carson City
and Reston, Virginia
National Park Service, San
Francisco
Bureau of Reclamation, Lahontan
Basin Projects Office
Environmental Protection Agency*
EPA, EIS Coordinator Region 9
Office of Federal Activities

STATE OF NEVADA

Office of the Governor*
State Planning Coordinator*
State Clearing House and State
Agencies*
All State Senators and
Assemblymen

OTHER ENTITIES

Carson City District Grazing
Advisory Board
Carson City District Advisory
Council
Legislative Committee for Review
of Federal Regulations
Legislative Council Bureau
Nevada Indian Commission
South Tahoe Public Utilities
District
State Multiple Use Advisory
Committee on Federal Lands
State N-3 Grazing Board
State Oil and Gas and Mining
Advisory Board
University of Nevada, Reno
Bureau of Mines and Geology
College of Agriculture
College of Arts and Sciences
Cooperative Extension Service,
Carson City, Minden, Reno
Department of Anthropology
Department of Biology
Department of Geology
Desert Research Institute
Division of Agriculture and
Resource Economics
Division of Plant, Soil and

Water Science
Division of Renewable Natural
Resources
Mackay School of Mines
Nevada Archaeological Survey
Western Nevada Community College

LOCAL GOVERNMENTS/LIBRARIES

City Officials for Reno, Sparks,
Minden, Gardnerville, Carson
City, Dayton, and Markleeville
County Commissioners and
Officials for Washoe, Storey,
Lyon, Douglas, Carson City,
Lassen, Alpine, Sierra and
Plumas Counties
Carson River Basin Council of
Governments
Washoe Council of Governments
Alpine County Library
Carson City Library
Douglas County Library
Lyon County Library
Nevada State Library
Washoe County Library
Main Branch
Sparks Branch
Stead Branch

TRIBAL COUNCILS

Inter-tribal Council of Nevada
Pyramid Lake Paiute Tribal
Council
Reno/Sparks Tribal Council
Washoe Tribal Council

ORGANIZATIONS

Amateur Archaeologists of Nevada
American Fisheries Society
American Horse Protection
Association*
American Humane Association*
American Motorcycle Association
American Sportsmen's Club
Animal Protection Institute
Audubon Society, Lahontan Chapter
California Association of 4 Wheel
Drive Clubs, Inc.
Canvasback Gun Club
Carson City Chamber of Commerce
Carson City Mineralogical Society
Carson River Conservation Fund
Carson Valley Chamber of Commerce

Desert Racing Association of Nevada
 Desert Fishes Council
 Friends of Nevada Wildlife
 German Shorthair Pointer Club
 Great Basin Zoological Society
 High Plains Shifters
 High Sierra Jeepers
 Humane Society of the United States
 Husqvarna Racing Team, Carson City
 In the Tracks of Fremont
 International Society for the Protection of Mustangs and Burros
 League of Women Voters, Carson City
 League of Women Voters, Reno
 Lyon County Museum
 National Animal Protection Association
 National Mustang Association
 National Resources Defense Council*
 Nevada Archaeological Association
 Nevada Cattlemen's Association*
 Nevada Environmental Education Council
 Nevada Farm Bureau Federation
 Nevada Historical Society
 Nevada Humane Society*
 Nevada League of Cities
 Nevada Off-Road Vehicle Association
 Nevada Open Land Organization Council
 Nevada Organization for Wildlife
 Nevada Outdoor Recreation Association*
 Nevada Sportsmen's Association
 Nevada State Sheep Commission
 Nevada Wilderness Association
 Nevada Wildlife Federation
 Nevada Woolgrowers Association
 Northern Nevada Brittany Club
 Northern Nevada Native Plant Society
 Ormsby Sportsmen's Association
 Over the Hill Gang
 Public Lands Council
 Red Rock Audubon Society
 Reno Chamber of Commerce
 Reno Gem and Mineral Society
 Reno Jeepers
 Reno 4 Wheelers

Reno Sno Drifters
 Resource Concepts, Inc.*
 Save the Mustangs
 Sierra Club, Toiyabe Chapter*
 Sierra Nevada Retriever Club
 Silver State 4 Wheelers
 Silver State Hunting Club
 Sparks Community Chamber of Commerce
 Storey County Sportsmen's Club
 The Wilderness Society
 The Wildlife Society, Nevada Chapter*
 Trout Unlimited
 Valley Off-Road Racing Association
 Virginia City Information Bureau
 Washoe Council of Governments
 Washoe Game Management Board
 Western Regional Environmental Education Council
 Wild Horse Organized Assistance*
 Livestock Grazing Permittees in the EIS Area

* - Those responding to the DEIS.

AVAILABILITY OF FINAL ENVIRONMENTAL IMPACT STATEMENT

The Final Environmental Impact Statement (FEIS) will be mailed to those who participated in the EIS process including those who commented on the DEIS. A general news release will be printed in the Federal Register and issued to the newspapers when the FEIS is available. Copies of the FEIS will be available for review at all BLM District and State Offices and public libraries at the following locations:

Office of Public Affairs
 18th and C Streets
 Washington, D.C. 20240

Nevada State Office (BLM)
 300 Booth Street
 Reno, Nevada 89520

California State Office (BLM)
 Fed. Bldg. Rm E-2841
 2800 Cottage Way
 Sacramento, California 95825

Battle Mountain District Office
North 2nd and So. Scott Streets
Battle Mountain, Nevada 89820

Las Vegas District Office
4765 West Vegas Dr.
Las Vegas, Nevada 89102

Tonopah Resource Area Office
Bldg. 102, Old Radar Base
Tonopah, Nevada 89409

Bakersfield District Office
800 Truxtum Avenue, Rm 311
Bakersfield, California 93301

Susanville District Office
P.O. Box 1090
Susanville, California 96130

Alpine County Library
Carson City Library
Douglas County Library
Lyon County Library
Nevada State Library
Washoe County Library
Main Branch
Sparks Branch
Stead Branch

PUBLIC REVIEW AND HEARINGS

A public comment period (July 2 to August 30, 1982) began subsequent to filing the DEIS with the Environmental Protection Agency (EPA). The public review was scheduled to provide concerned agencies and publics the opportunity to review the DEIS and the environmental impacts of the alternatives including the proposed action.

The DEIS was filed with the EPA on July 2, 1982 and a BLM notice advertising availability of the DEIS was published in the July 8, 1982 issue of the Federal Register (Vol. 47, No 131). This notice announced that the review period ended August 30, 1982, and included notification of public hearings in Reno and Carson City. After the DEIS was filed with the

EPA, over 500 Summaries and over 200 copies of the DEIS were distributed to reviewing agencies and interested publics with a cover letter announcing the times and locations of the scheduled public hearings. Reading copies of the DEIS were distributed to public libraries in Nevada and to Bureau of Land Management State and District offices. News releases were issued from the Carson City District Office and the Nevada State Office to local and regional news media.

Two persons gave testimony at the Reno Public Hearing (Rose Strickland and Marjorie Sill) and one at the Carson City Hearing (Ed Smith).

Transcripts of the public hearings are available for inspection at the following locations: BLM Carson City District Office, 1050 E. William St. Suite 335, Carson City, Nevada; BLM Nevada State Office, Room 300, Federal Building, 300 Booth Street, Reno, Nevada; and the Office of Public Affairs, BLM, 18th and C Streets, Washington, D.C.

INTRODUCTION TO RESPONSES

All letters and testimony were reviewed to determine if they met the required criteria for response, i.e., discussion of the adequacy of the DEIS. Substantive comments which presented new data, questioned facts and or analyses, or commented on issues bearing directly on the DEIS or the environmental impacts of the alternatives including the proposed action were fully evaluated and given responses. Changes or additions to the DEIS have been incorporated into the errata of this final statement.

If the comments of those that made oral testimony at the public hearings are also covered through letters to the district then the responses are made to the letter and not the transcripts.

LIST OF RESPONDENTS TO THE DEIS

LETTER NO.	RESPONDENT
1	State of Nevada Clearinghouse
2	Nevada Department of Wildlife
3	United States Fish and Wildlife Service
4	Toiyabe Chapter of Sierra Club #1
5	Resource Concepts, Inc.
6	Nevada Cattlemen's Association
7	CA-NV Representative of Sierra Club
8	Wild Horse Organized Assistance
9	American Horse Protection Association, Inc.
10	Nevada Humane Society
11	Craig C. Downer, M.S.
12	United State Environmental Protection Agency
13	Humane Society of Southern Nevada
14	The Wildlife Society (Nevada Chapter)
15	Natural Resources Defense Council, Inc.
16	Toiyabe Chapter of Sierra Club #2

Comment Letter 1



August 5, 1982

Kelly Madigan
EIS Team Leader
Bureau of Land Management
Carson City District Office
1050 E. William Street
Carson City, Nevada 89701

RE: SA1 NV# 83300007 Project: Draft - Reno Grazing EIS

Dear Mr. Madigan:

Attached are the comments from the following affected State Agencies: Divisions of Historic Preservation and Archeology, Water Planning, Environmental Protection, State Parks, and the Department of Wildlife concerning the above referenced project.

These comments constitute the State Clearinghouse review of this proposal. Please address these comments or concerns in the final decision.

Sincerely,


John Wm. Sparbel
State Planning Coordinator

JWS/sl
Enclosure

Comment Letter 1

Response Letter 1

NEVADA STATE CLEARINGHOUSE REVIEW FORM

PLANNING COORDINATOR

TO: *State Planning*

FROM: *State Planning*

1. Transportation

2. Conservation & Natural Resources

3. Human Resources

4. Agriculture

5. Budget

6. Historic Preservation & Archeology

7. Agriculture

8. Community Services Agency

9. Commerce

10. Public Service Commission

11. State Planning Coordinator

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966. Other

967. Other

968. Other

969. Other

970. Other

971. Other

972. Other

973. Other

974. Other

975. Other

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995. Other

996. Other

997. Other

998. Other

999. Other

1000. Other

Attached for review and comment is a copy of the aforementioned project. PLEASE evaluate it with respect to:

- 1) the program's effect on your plans and programs
- 2) the importance of its contribution to State and/or Area-wide goals and objectives
- 3) its accord with any applicable law, order or regulation with which you are familiar
- 4) additional considerations.

PLEASE submit your comments to this office NO LATER THAN 9-2-82 by checking the appropriate box below and returning the form to this office. Please do so even if you have no comment on this particular project so that we may complete our processing.

THIS SECTION TO BE COMPLETED BY REVIEWING AGENCY ()

☐ No comment on this project

☐ Approval supported as written (see below)

☐ Disapproval/Amendment of funding (must specify reason below)

Comments (use additional sheets if necessary)

This Division has received and reviewed the draft of the Reno Grazing Environmental Impact Statement and determined the DEIS to be unsatisfactory in its treatment of cultural resources.

Properties listed on or determined eligible to the National Register of Historic Places within the proposed project area must be identified in the DEIS. Reference should be made to Class I inventories completed or planned. The acreage and percentage of the area that has been inventoried at a class II level should be described and a commitment made to conduct further Class II surveys. Additionally, the DEIS should contain a discussion of potential environmental consequences or cultural resources.

I suggest you review the current PNOA between the BLM, the Advisory Council on Historic Preservation and the NCSHPD on grazing which provides guidelines for grazing EIS's. If you wish to discuss this matter in greater detail, please call me.



Alfred M. Becker for
Steve Ruckelshaus
 SHPD
 Title
 (702) 885-5138
 Phone
 8/3/82
 Date

The reader is referred to the Carson City BLM District Cultural Resources Overview (in press) for a listing of National Register and National Register eligible properties within the EIS area.

An exhaustive Class I Cultural Resources Overview has been prepared for the District and is currently in press. To date only an insignificant acreage has been completed at the Class II level. The in-depth nature of the Class I as well as project-specific Class II inventories have provided a data base for current management, precluding the need for Class II inventories in order to prepare the cultural resource sections of the grazing EIS. A Programmatic Memorandum of Agreement with the Advisory Council on Historic Places calls for further Class II inventories in the EIS area. Contingent upon funding, these inventories will be undertaken.

Standard Operating Procedures require that a cultural resources clearance be made prior to any surface disturbing activity on public lands. Where impacts will occur a mitigating measure in accordance with federal law and regulation will be undertaken.

Comment Letter 1



MEMORANDUM

ADMINISTRATOR

MEMORANDUM

STATE OF NEVADA
ADDRESS HEREIN TO:
DIVISION OF WATER PLANNING
2016 FALL STREET, RYE BLDG
CAPITOL COMPLEX
CARSON CITY, NEVADA 89701

TELEPHONE 17021 AND 4877

July 30, 1982

TO: Nevada State Clearinghouse *Robert Walstrom/lyc*
FROM: Robert E. Walstrom, Hydraulic Engineer III
SUBJECT: SAJ NV8330007. Draft - Reno Grazing EIS.

The Division has reviewed the above referenced document and wish to make the following comment concerning the water component of the Draft EIS.

Of those actions proposed, the Division supports the "Proposed Action" set forth in the EIS as the most favorable from a water resource standpoint.

REW/1c

cc: Roland D. Westergard, Director
Department of Conservation and Natural Resources



A DIVISION OF THE DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES, ROLAND D. WESTERGARD, DIRECTOR

Comment Letter 1

NEVADA STATE CLEARINGHOUSE REVIEW FORM

TO: *State of Nevada, Planning / Policy*

FROM: *Robert Walstrom/lyc*

SUBJECT: *SAJ NV8330007. Draft - Reno Grazing EIS*

PLANNING COORDINATOR
GOVERNOR'S OFFICE
CAPITOL COMPLEX
CARSON CITY, NEVADA
89401

RECEIVED
JUL 15 1982
7-14-82
Date

ENVIRONMENTAL
PROTECTION
JUL 15 1982

PROJECT: *Draft - Reno Grazing EIS*

1. ☒ Planning
2. ☒ Conservation & Natural Resources
3. ☒ Human Resources
4. ☒ Wildlife
5. ☒ Budget
6. ☒ Historic Preservation & Archeology
7. ☒ Agriculture
8. ☒ Community Services Agency
9. ☒ Commerce
10. ☒ Public Safety Commission
11. ☒ State Planning Coordinator

FROM: *Robert Walstrom/lyc*

SAI NV # *8330007*

Attached for review and comment is a copy of the aforementioned project. PLEASE evaluate it with respect to:

- 1) the program's effect on your plans and programs
- 2) the importance of its contribution to State and/or Area-wide goals and objectives
- 3) its accord with any applicable law, order or regulation with which you are familiar
- 4) additional considerations

PLEASE submit your comments to this office NO LATER THAN *8-2-82* by checking the appropriate box below and returning the form to this office. *Please do not open if you have no comment on this particular project so that we may complete our processing.*

THIS SECTION TO BE COMPLETED BY REVIEWING AGENCY ()

- ☒ No comment on this project ☐ Conference desired (see below)
- ☒ Proposal supported as is or (then) (see below) ☐ Conditional support (justified below)
- ☒ Additional information (see below) ☐ Disapproval/demand of further study (specify reason below)

Comments (are additional sheets if necessary)

AKR - Dick Serdoz: No comment.

WATER - Harry van Drielen: Endorse those programs which reduce vegetation loss with resultant increased siltation of streams and lowered ground water quality and quantity.

SOLID WASTE - Verne Russe: No comment.

R. E. Walstrom/lyc
Reviewer's Signature

Administrator

885-4670

7/22/82

Title

Phone

Date

Comment Letter 1



DIVISION
OF
STATE
PARKS

MEMO

TO John Spario
FROM John L. Ruder
SUBJECT MOUNT RENO GRAZING EIS

DATE 7-30-92

The Division has statewide responsibilities for outdoor recreational planning. The grazing EIS allocates forage and therefore determines land use in the EIS area.

The Division supports any alternative that protects or improves resources for outdoor recreation or related resources. Therefore, the resource protection alternative or the proposed alternative, or a new alternative that combined the best of each of these, would be recommended by this Division.

The EIS identifies that 65% of recreation is vehicle dependent, while 35% is non-vehicle related (horseback riding, hiking, etc.). Yet no primitive areas were identified in the EIS area and only 15% of the area is presently classified as semi-primitive in the grazing improvements (roads, fences, etc.) that would deteriorate any of the semi-primitive non-motorized areas.

JLR:tlc

Comment Letter 1



HOG VALLEY ROAD

P.O. BOX 10678

RENO, NEVADA 89320

TELEPHONE (702) 784-8214

WILLIAM A. MOULDER
DIRECTOR



ROBERT LINT
MANAGER

August 2, 1982

Mr. John Sparbel
State Planning Coordinator
State Clearinghouse
Capitol Complex
Carson City, NV 89710

Dear John:

The Nevada Department of Wildlife appreciates the opportunity to review and comment on the Draft - Reno Grazing Environmental Impact Statement (SAI NV # 83300007). The specific allotments identified for future intensive management of livestock grazing (total of ten) appear to also represent those areas of potential conflict with the fish and/or wildlife resources in the area. Any documented conflicts between livestock and wildlife will necessarily be addressed during the future recommended GRMP process.

Several items that were not addressed in the DEIS which our agency believes are pertinent include the following:

- 1-2 1. The presence of mountain quail was not identified in the document even though the area represents a "stronghold" for the species in the state.
- 1-3 2. The potential for reintroduction of bighorn sheep needs to be addressed in the DEIS for planning purposes. Specific areas or potential sites were listed in the Nevada Department of Wildlife's 1977 input report to the BLM.
3. Since the completion of the Nevada Department of Wildlife's 1977 wildlife report, considerable new information has been gathered on the status and trend of antelope in the area. These data should be incorporated into the final document with allowances made for their needs.

Response Letter 1

- 1-2 Neither population nor harvest data for mountain quail are listed by NDOW in its 1981 UPLAND GAME, MIGRATORY GAME BIRDS, FUR INVESTIGATIONS, AND HUNTING SEASON RECOMMENDATIONS book.

We also did not consider them to be a significant species for analysis in the DEIS.

- 1-3 The potential for reintroduction of bighorn sheep into the Pah Rahs and Tule Peak was not discussed because it was not considered a significant issue in this DEIS. A wildlife habitat management plan exists for that particular area and does address the bighorn reintroduction.

Comment Letter 1

Mr. John Sparbel
August 2, 1982
Page 2

Because of the relatively short time parameter allowed for agency comment on this document, we were not able to circulate the manuscript to all appropriate department personnel for review purposes. Pending possible significant comments from field personnel relative to items that may have been overlooked by the staff, we wish to stipulate that additional comments of significance may be forthcoming in the near future. As a means of meeting BLM deadlines, we would like to send any additional comments directly to the Carson City office of the BLM with a copy of the same to the State Clearinghouse for record purposes.

If you have any questions relative to the above, please advise at your earliest convenience.

Sincerely,

Willie

William A. Molini
Director

BPH:pw

cc: Region 1

36

Comment Letter 1



August 6, 1982

Mr. Kelly Madigan
EIS Team Leader
Bureau of Land Management
Carson City District Office
1050 E. William Street
Carson City, Nevada 89701

RE: SAI NY# 83300007 Project: Draft - Reno Grazing EIS

Dear Mr. Madigan:

Attached is an additional comment from the Division of Forestry that was received after our previous letter to you. Please incorporate this comment in your decision making process.

Sincerely,

John W. Sparbel
John W. Sparbel
State Planning Coordinator

JWS/sl
Enclosure

Comment Letter 1

Comment Letter 1

ROLAND D. WESTBORG, Director
Department of Conservation
and Natural Resources

ROBERT LINT
Governor

Address Reply to:
Rye Building
300 S. 1st Street
Carson City, Nevada 89701
881-4130

LOWELL S. "Loot" SMITH
State Forest Forester



OK
(LVS)

STATE OF NEVADA
DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES

DIVISION OF FORESTRY

CAPITOL COMPLEX
CARSON CITY, NEVADA 89701
August 3, 1982



MEMORANDUM

To: L. V. Smith, State Forester
From: R. Ronan Thornhill, Resource Planner /ns
Subject: EIS - BLM Draft Reno Grazing EIS
83300007

After reviewing this proposed BLM grazing EIS for the Reno area, the Division of Forestry does not object to the proposed grazing plan. The Reno EIS area covers approximately 699,000 acres of public land in southwestern Nevada. The Bureau is using (CRMP) which is coordinated resource planning which is the method by which the Bureau's public can get involved in the decision making process of land use planning.

In the analysis of the alternative, including the proposed action, has determined that there would be no significant impacts to visual resources, cultural resources, water quality/quantity, threatened endangered species, areas of critical environmental concern, wilderness and climate.

The major area of concern or controversy involved the initial adjustments in livestock, wild horse and mule deer use based on completed range inventory information. The Nevada Cattlemen's Assoc. believe the wild horse count could be as much as 40% below the actual numbers just in the Pine Nut Range alone - due to vegetative cover concealing much of the actual herd.

The areas of concern do not contradict any policy action of the Division of Forestry, although the Division considers the use of our Desert Forests an important wood producing product rather than just a range management program under the BLM.

lb



UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
NATIONAL SYSTEM OF PUBLIC LANDS
CARSON CITY DISTRICT OFFICE
1050 E. WILLIAM ST.
CARSON CITY, NEVADA 89701

August 10, 1982

Mr. Kelly Madigan
EIS Team Leader
Bureau of Land Management
Carson City District Office
1050 E. William St.
Carson City, Nevada 89701

RE: SAI W# 83300007 Project: Draft - Reno Grazing EIS

Dear Mr. Madigan:

Attached is an additional comment from the Conservation District that was received after our previous letter to you. Please incorporate this comment in your decision making process.

Sincerely,

John M. Spärbel
John M. Spärbel
State Planning Coordinator

JMS/sj
Enclosure

Comment Letter 1

Carson City / Water Resources / Carson Dist.
NEVADA STATE CLEARINGHOUSE REVIEW FORM

to: State of Nevada
☒ Transportation
☒ Conservation & Natural Resources
☒ Human Resources
☒ Wildlife
☒ Budget
☒ Historic Preservation & Archeology
☒ Agriculture
☒ Community Services Agency
☒ Commerce
☒ Public Service Commission
☐ _____
☐ _____
☐ _____

PLANNING COORDINATOR
GOVERNOR'S OFFICE
CONTROL COMPLEX
CARSON CITY, NEVADA
89101

7-14-82
Date

FROM: John W. Sperbel
Assistant, State Planning Coordinator

SAI NV# 83300007

PROJECT: Draft - Reno Grazing EIS

Attached for review and comment is a copy of the aforementioned project. PLEASE evaluate it with respect to:

- 1) the program's effect on your plans and programs
- 2) the importance of its contribution to State and/or Areawide goals and objectives
- 3) its accord with any applicable law, order or regulation with which you are familiar
- 4) additional considerations.

PLEASE submit your comments to this office NO LATER THAN 8-2-82 by checking the appropriate box below and returning the form to this office. Please do so even if you have no comment on this particular project so that we may complete our processing.

THIS SECTION TO BE COMPLETED BY REVIEWING AGENCY (Div. of Conservation Districts)

- ☐ No comment on this project
☐ Proposal supported as written (see below)
☒ Additional information (see below)
☐ Conference desired (see below)
☐ Conditional support (outlined below)
☐ Disapproval/Annull of funding (must specify reason below)

Comments: *(use additional sheets if necessary)*

The State Division of Conservation Districts appreciates the opportunity to review this EIS. We do not have detailed knowledge of these allotments that would enable us to comment upon specific data and/or recommendations. However, the methodology of the EIS are acceptable, as is the preferred alternative, as long as implementation is through a continued program of adding inventory data, monitoring, and working with other agencies and groups through coordinated resource management planning.



PARNA
Assistant, Division

State Planning Coordinator

83-5416

08/06/82

Comment Letter 1



September 3, 1982

Mr. Kelly Madigan
EIS Team Leader
Bureau of Land Management
Carson City District Office
1050 E. William St.
Carson City, Nevada 89701

RE: SAI NV# 83300007 Project: Draft - Reno Grazing EIS

Dear Mr. Madigan:

Attached is an additional comment from the Department of Agriculture that was received after our previous letter to you. Please incorporate this comment in your decision making process.

Sincerely,

John W. Sperbel
John W. Sperbel
State Planning Coordinator

JWS/sj
Enclosure

Comment Letter 1

Approved 10/17/82 by Nevada Governor, Phil
NEVADA STATE CLEARINGHOUSE REVIEW FORM

- NO. State Parks Water, Planning / Forestry
- ☐ Transportation ☐ Employment Security Department
- ☐ Conservation & Natural Resources ☐ Energy
- ☐ Human Resources ☐ Law Enforcement Assistance
- ☐ Wildlife ☐ Taxation
- ☐ Budget ☐ Equal Rights Commission
- ☐ Historic Preservation & Archeology ☐ Economic Development
- ☐ Agriculture ☐ G.O.P.C.
- ☐ Community Services Agency
- ☐ Commerce
- ☐ Public Service Commission

PLANNING COORDINATOR
GOVERNOR'S OFFICE
CAPITOL COMPLEX
CARSON CITY, NEVADA
89601

7-14-82
DATE

FROM: John Schuler
Nevada State Planning Coordinator

IAI NV # 83300007 PROJECT: Draft - Reno Grazing EIS

Attached for review and comment is a copy of the aforementioned project. PLEASE evaluate it with respect to:

- 1) the program's effect on your plans and programs
- 2) the importance of its contribution to State and/or Area-wide goals and objectives
- 3) its accord with any applicable law, order or regulation with which you are familiar
- 4) additional considerations.

PLEASE submit your comments to this office NO LATER THAN 8-2-82 by checking the appropriate box below and returning the form to this office. Please do so even if you have no comment on this particular project so that we may complete our processing.

THIS SECTION TO BE COMPLETED BY REVIEWING AGENCY (Agriculture)

- ☐ No comment on this project ☐ Conference desired (see below)
- ☐ Proposal supported as written (see below) ☒ Conditional support (outlined below)
- ☐ Additional information (see below) ☐ Disapproval/denial of funding (must specify reason below)

Comments: (use additional sheets if necessary)

The Nevada Department of Agriculture (NDA) supports the proposed range improvements in Category I allotments because improved livestock vegetation utilization and improved wildlife habitat will result from these actions.

Similarly, NDA supports the removal of wild horses from checkerboard lands since improved range quality and reduced BLM operating costs will result from these actions.

The NDA feels a reduction in wild horse numbers should also be effected on non-checkerboard lands.

BLM wild horse number estimates on EIS area allotments were 241 and 435 in 1971 and 1973, respectively. These estimates indicate horse numbers increased at approximate annual rates of 24% from 1971 to 1981 and 22% from 1973 to 1981. While not exact, these data indicate wild horse herds have been reproductively quite successful. Reduction of these herds to 1971 numbers or even 1973 numbers would not reduce their reproductive success. In fact, maintenance of lower herd numbers will probably increase the health of the herds by reducing intraspecific competition. Other benefits would be reduced interspecific competition with livestock and wildlife and reduced BLM operating costs.



John Schuler Nebraska specialist 704-6701 8/24/82

Comment Letter 2



WILLIAM A. MOLINI
Director

ROBERT LIET
Governor

HOG VALLEY ROAD

P.O. BOX 10878

RENO, NEVADA 89320

TELEPHONE (702) 784-8214

September 2, 1982

Bureau of Land Management
Tom Owen
District Manager
1050 E. Williams Suite 335
Carson City, Nevada 89701

Dear Tom:

The Nevada Department of Wildlife, Region 1, appreciates the opportunity to review and comment on the Draft Reno Grazing EIS Summary and the Draft Reno Grazing EIS. The following are our comments relative to those documents which have been compiled at our Regional level.

2-1

1. This document doesn't seem to address some important goals in the proposed action to show justification for grazing on public land and to provide for general improvement in range trend and condition. Some examples of what we consider important goals are maintenance and improvement of riparian and riparian areas, and improvement in production of native range species.
2. A document of this type should address topic matters such as turnout dates, utilization levels and seasons of use. We realize that soils and plant phenology come into play here, however, these factors should be identified and discussed to show their importance. CBWP groups will eventually need some guidelines or criteria to follow in this area.
3. The "custodial" categorization applied to the allotments in the Pah Rah Range may not give wildlife in that area the consideration they need. That area has some high wildlife values located in close proximity to the population centers of Reno-Sparks. We feel those allotments need special consideration and some improved management systems to keep up with the demands on those resources.

Response Letter 2

2-1

Refer to Tables 1-3 of DEIS: of the units shown, the following are for protection of 148 small habitats (including riparian) in the 1 allotments: 23 miles of fence, 41 spring collection boxes, 83 water troughs, 13 geblone, 3 culverts, and 5 bird ramps.

One hundred and eighty-three acres would be fenced of the 475 acres identified. The 183-acre figure was taken directly from wildlife habitat inventory data. Several sites identified in the wildlife habitat inventory URA Step 2 were deemed impractical to fence due to location, topography, or area of maintenance.

Comment Letter 2

Mr. Tom Owen
September 2, 1982
Page 2

4. Under Riparian and Aspen Communities it is mentioned that 183 acres of riparian areas could be fenced to significantly improve the ecological condition. We feel that this would only represent a lean effort toward riparian habitat protection.
- 2-2 5. Under Mule Deer in the wildlife section, we show some small differences in the AUM requirements for deer. Most are insignificant, however, we show a significant difference in the requirements for the Constantine allotment - 1439 AUMs versus 2023 according to our calculations.
6. The Mule Deer and Sage Grouse Habitat Map does not show Peterson Mountain as year-long range for deer.
7. The Pah Rah Range should be shown as key year-long deer range.
- 2-3 8. Recently identified areas in the vicinity of Wilcox Canyon and Flaxson Canyon should be delineated as deer winter range.
9. On the Mule Deer and Sage Grouse Habitat Map there should be additional sage grouse strutting grounds delineated in the Flaxson and Pah Rah Ranges. Also, the area between Pond Peak north to Monte Cristo in the Pah Rah Range should be delineated as a use area for sage grouse.
- 2-4 10. Antelope are not mentioned and the area north of Interstate 80 supports 125-150 antelope. Improved habitat and water distribution would allow for increased numbers of this species.
- 2-5 11. The potential for reintroduction of bighorn sheep in the Tule Mountain and Pah Rah areas was not discussed. General mention of specific sites and potential was included in NDMW input to your agency.
- 2-6 12. Mountain quail were not mentioned in the document. The Reno EIS area supports the most significantly portion of occupied mountain quail habitat in the state.
- 2-7 13. Under nongame birds, the document does an adequate job of stressing the importance of protection of key riparian habitats, however, as stated in item #4, no significant meadows are mentioned to provide for protection and maintenance of the same.

If you have any questions regarding the above comments, feel free to contact me at our Fallon Office.

Sincerely,

Sam Milleazzo
Sam Milleazzo
Regional Supervisor
Region I

SM:OT
CC: Habitat Section

Response Letter 2

2-2 Refer to Chapter 1 Errata.

2-3 Peterson Mountain was not shown as yearlong range for mule deer because of a cartography error. The new information regarding Flaxson and Wilcox canyons and the Pah Rah Range will be considered in the decision making process. No sage grouse strutting grounds were shown in the Pine Nut or Pah Rah ranges because specific sites are not known, even though NDMW and BLM biologists are convinced sage grouse likely do occur in these areas.

The DEIS maps are such that they cannot be changed for the final EIS, but Carson City District Office records and maps will be changed to reflect this additional information.

2-4 The current antelope population is estimated at 150 animals. They use most of the EIS area north of Reno. Because they move frequently and are not concentrated in any particular allotment, no forage demand was developed for them as was done for mule deer. The demand for 150 antelope (yearlong) is estimated to be 360 AUMs in the EIS area, while that for mule deer is 14,235, to lend comparison and perspective to the relative importance of antelope.

2-5 Refer to Response 1-3.

2-6 Refer to Response 1-2.

2-7 Refer to Response 2-1.



United States Department of the Interior

FISH AND WILDLIFE SERVICE

FISHERIES ASSISTANCE OFFICE
4600 Kietake Lane - Bldg. C
Reno, Nevada 89502-5093

August 30, 1982

Mr. Edward F. Spang, State Director
Attn: Kelly Madigan, EIS Team Leader
Bureau of Land Management
300 South Street
P. O. Box 12000
Reno, Nevada 89520

Dear Mr. Spang:

This is in response to your request for comments on the Draft
Reno Grazing Environmental Impact Statement, July 12, 1982.

Riparian habitat is of outstanding importance for migratory
bird populations in this area. In Summary Table 4 under Proposed
Action, Riparian Habitat, no apparent increases in this habitat
type is indicated. Thus, one of the major objectives in this
grazing impact statement process does not appear to be addressed
through the proposed action. On page 3-4, 183 acres are pro-
posed for fencing, and Summary Table 4 indicates improvements
only in the excellent and good categories, but on page 2-6 it
is stated that only 23 acres of riparian habitat are available
in only one category, good condition. Also, it is unclear from
the description in Environmental Consequences, Riparian and Aspen
Communities, page 3-4, specifically where fencing will be done to
accomplish the increases identified for riparian habitat in
Summary Table 4. We urge that riparian habitat restoration be
reconsidered.

Sincerely,

Donald J. Galt
Project Leader

cc: Nevada Dept. of Wildlife, Reno
Nevada Dept. of Wildlife, Fallon

3-1

See Table 2-5 of the DEIS, page 2-12. All of these habitats
are legally described to the nearest 40 acres and are shown
on topographic maps available in the Carson City
District files.

Also refer to Response 2-1.



SIERRA CLUB

Toiyabe Chapter - Nevada and Eastern California

PLEASE REPLY TO:

☐ GRIFFIN GROUP
P.O. Box 30738
University Station
Reno, Nevada 89507

☐ LAS VEGAS GROUP
P.O. Box 15777
Las Vegas, Nevada 89115

August 27, 1982

Tom Owen, Manager
BLM/Carson City District
1858 East William St. #335
Carson City, NV 89701

Dear Manager Owen,

I am pleased to submit these comments on the Reno draft Environmental Impact Statement on behalf of the Toiyabe Chapter of the Sierra Club and Nevada Outdoor Recreational Association. The Toiyabe Chapter has over 800 members in the Reno Resource Area and has been deeply involved in the development of the land use plan over the last two to three years. NOAA's interest in proper public land management is nationally known.

Both organizations are very disappointed in the Reno DEIS as it does not begin to represent the knowledge and accumulated data that the Carson City District Office has on the area much less propose any management actions which will substantially address the resource problems we have been discussing over several years. We wonder if the input we gave into the MFP-1 and MFP-11 studies was even considered in the development of the DEIS.

Procedurally, the DEIS has several fatal flaws. The most obvious one is the lack of a no livestock grazing alternative, as required by National Environmental Policy Act, Council on Environmental Quality regulations as well as BLM's own policy. The rationale for not analyzing the alternative is that no livestock grazing is "unreasonable and unrealistic." This reasoning "misunderstands" the actual purpose of analyzing a full range of alternatives as well as using no livestock grazing as baseline data against which to compare other alternatives. Removing all wild horses as proposed in the Maximization of Livestock alternative is also unreasonable and unrealistic, yet BLM includes total wild horse removal in the DEIS. We suspect that BLM took the chance of being challenged on this deficiency because including a no livestock grazing alternative would have been worse. The positive impacts of a no livestock grazing alternative would have been so far superior to those of the Proposed Action that even BLM would have been embarrassed!

To explore, enjoy, and protect the natural mountain scene...

4-1

A No Livestock Grazing Alternative is not required by NEPA. See also DEIS page 1-1.

4-1

This "misunderstanding" by BLM of the purpose of alternatives is also reflected in the inadequacy of the range of alternatives in the Reno DEIS. The "alternatives" are actually variations of the Proposed Action/No Action alternative, as basic management actions proposed are the same as are their "impacts" on the environment. This similarity is obvious in the Summary Table as one reads that the changes due to other alternatives in vegetation, both positive and negative, in riparian habitat and in wildlife are not only not significantly different, but are even the "same as the proposed action" in many instances. We could only conclude after review of the entire DEIS that the Summary Table is accurate and truly demonstrates that no meaningful range of alternatives is analyzed in the DEIS.

On p.1-1, the selective understanding by BLM of this entire EIS process is astounding. "An EIS was deemed necessary by the BLM as a result of a 1973 suit filed in federal court by the National Resource Defense Council (NRDC) stating that BLM's programmatic grazing EIS approach was not adequate and did not comply with NEPA." The Carson City District is apparently unaware that NRDC won its suit and the programmatic Reno DEIS is in violation of the court-ordered grazing EISs. The tables and charts of problems and proposed management actions appear to us like BLM staff wrote all elements down on flash cards and then manipulated the cards to get "different" results. It does not take much intelligence to manipulate programmatic components and the results of the Reno DEIS reflect that level of effort.

Most importantly, BLM is in violation of the Taylor Grazing Act, the Federal Lands Policy Management Act, and the Public Rangelands Improvement Act as well as its own policies and regulations in proposing that BLM knowingly continue to license livestock use in excess of the range capacity in the Reno Resource Area for at least another five years. On p.3-5, the document states "Based on preliminary data from existing studies the existing demand by livestock, wild horses and wildlife exceeds the supply of forage currently available by approximately 8000 acres per year." The Proposed Action of the Reno DEIS proposes to institutionalize overgrazing in defiance of law and professional range management practices.

Substantively, the Reno DEIS is even more inadequate than its procedural problems would indicate. The proposed Action is deficient in its nature, its rationale, and its feasibility. On the surface, BLM proposes to spend over \$800,000 to 1). maintain the last three-year's average livestock use and 2). achieve insignificant improvements in range condition and wildlife habitat. A thorough examination of the document reveals, however, that despite the disclaimer on p.vi that "the grouping of

4-2

In order to develop the proposed action it was first necessary to group allotments into Categories M, I and C. The criteria used to do this is discussed in Appendix E of the DEIS. In Chapter 4, definite management actions under each Category have been proposed that would begin to solve specific resource problems associated with a given category of allotments. It is these specific management actions that comprise the proposed action.

Comment Letter 4

4-2

allotments into categories M, I, and C is not the Proposed Action, " that MIC is essentially the major action BLM proposes. The specific problems, objectives, and proposed management actions to eliminate the problems (pp.1-1 to 1-6) as well as the analysis of environmental consequences in Chapter 3 depend on this categorization.

Secondly, categorizing allotments is biologically unsound. Not only are allotment boundaries based on historical accident rather than on biologically sound categories, such as range sites, but also each allotment contains the full range of resource conditions and problems, such as some areas overused and some underused. Biological conditions cannot be "averaged" with any (then politically dictated) confidence, nor can management actions be prescribed like aspirin. In addition, categorization is socio-politically unsound as livestock permittees in I allotments are rewarded with public range improvement funds and intensive management plans at the expense of the permittees whose good stewardship has resulted in M categorization of their allotments.

Thirdly, the implementation of management actions is contingent on Coordinated Resource Management Planning (CRMP) which places unrealistic reliance on this voluntary process. Any number of permittees may oppose its use on their allotments. Yet no alternative method of decision recommending/making is discussed in the DEIS. Also, grazing decisions may be delayed indefinitely as they are scheduled "17 months after publication of the final EIS unless funding and workforce capabilities are insufficient." We have just learned that due to budget cuts, the Carson City District BLM office will be losing 22 personnel next fiscal year as well as significant amounts of funding for renewable resource management programs.

4-3

From our review of Chapter 1, we have concluded that while BLM claims it has insufficient data to adjust grazing to the carrying capacity of the Reno Resource Area, we wonder if BLM has insufficient data to justify the last three-year's average use as proposed in the Proposed Action.

The other "alternatives" also suffer from procedural and substantive deficiencies. The No Action alternative can hardly be distinguished from the Proposed Action except in the level of range improvements proposed. The Maximization of livestock alternative proposes the same initial level of livestock (over)use as the Proposed Action. This alternative is particularly inappropriate in an urban Resource Area where hundreds of thousands of residents are placing increasing demands on the nearby public lands for recreation, wildlife, wilderness, and other non-commercial values. The Reno DEIS ignores the

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We are not proposing a restriction to the past three years average use. We feel that this level of active use will probably stay close to the 44,000 AUM figure. However, the livestock permittee can activate any non-use taken if he wishes to. The present non-use in the EIS area has been taken for various reasons mostly economical, and will probably stay about the same in the next few years for the same reasons.

Any reduction in preference would have to be done by management decision and would go through the appeals procedure. There is no basis to assume that actual use has any relation to proper use, they are generally like apples and oranges.

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urban environment and discusses livestock grazing as if it is the dominant use. The Resource Protection alternative is the only one which proposes a different level of livestock use, but its full implementation still will have significant negative impacts on the environment, especially on critical riparian areas, and will effect insignificant improvements in vegetation and wildlife habitat.

4-4

At this point, we must question the "data" which BLM uses and chooses not to use as the "lack" of data appears to be the cause of the superficial alternative developed and the superficial analysis of environmental consequences of those alternatives in the Reno DEIS. BLM rejects the use of the SVM inventory data on which to base livestock and wild horse adjustments due to "some inconsistency" (p.1-Summary). Instead, all alternatives propose more intensive monitoring to accumulate data on which presumably, grazing decisions will be based in 17 months.

Yet data appears to be sufficient to categorize allotments (Table 1-1 and Appendix E), to determine ecological and forage condition by range site and allotment (Table 2-3, 2-4 and Appendix F) and to elicit the statement on p.3-5 that based on preliminary existing studies, existing demand by livestock, wild horses and wildlife exceeds the carrying capacity of the range by 8000 some per year. We wonder how much data BLM will need to ever feel satisfied it is sufficient on which to base livestock reduction. Will BLM have enough data in 17 months or 5 years to "support" its grazing decisions, especially given realistic budget and staff constraints? Of great curiosity to us is what data BLM is currently using to justify the last three-year's average livestock use in the Proposed Action?

The reader is lead into great confusion about what data BLM has, what data BLM will use and why, and the data BLM won't use and why. On p.3-9 and 3-10, the author sounds very definite in his statements on the causes of massive range deterioration in the Reno Resource Area: "The continued deterioration of ecological condition is the result of several factors, most notably the overutilization of the vegetation resource by livestock and wild horses. Overutilization is occurring in 15 allotments...Several allotments exhibiting overutilization are continually grazed year-round, during the wrong season, or have early livestock turnout...Continued overutilization of vegetation from heavy stocking rates will result in continued deterioration of plant vigor and a decrease in desirable climax plant species, ultimately resulting in deteriorated range condition. Early livestock turnouts and improper periods-of-use will have similar effects on the vegetation resource..." These

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4-4

The SVM inventory is made up of many parts. Soils, Plant Composition, Range Site Descriptions, Vegetation Potential, Plant Phenology, Vegetation Production, Condition Class and other information.

The vegetative production data has some errors and is in question. This is the only portion not being used.

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statements are based on "Range Management, URA Step 3." Apparently, the data is sufficient to understand the resource problems, but is insufficient to support BLM actions to solve resource problems, much less to analyze proposed alternatives in a grazing EIS. In Appendix D, Section 2 on SVM Methodology, the rationale for not using forage production data derived from the range survey for determining grazing capacity on individual allotments is attributed to inconsistencies. The inconsistencies are due to insufficient numbers of samples or size of area sampled, which in turn leads to overestimating the production as often as it would underestimate the production (p.5-23). Although not a statistician, this reader believes that these "inconsistencies" would tend to cancel each other out, yielding reasonably reliable if not 100% accurate data to guide management decisions.

The selective use of its own data in Chapter 1 and in Chapter 3 does a great disservice to BLM's own professional staff and to the public who paid for the surveys and studies.

The DEIS is also poorly and awkwardly written with confusing and misleading formats which serve to conceal the data rather than to display it. We feel that the data on which to base good range management decisions may be in the DEIS, but not in a form intelligible to the public or usable by public land managers. In short, we feel the DEIS is like a giant jigsaw puzzle with all the pieces forced into the wrong spaces.

The analysis of environmental consequences in Chapter 3 is especially useless. BLM offers no explanation of why impacts to cultural resources, Visual Resource Management, Threatened and Endangered Species, Areas of Critical Environmental Concern, air quality, and wilderness are "considered to be site specific" and will be analyzed as part of an Environmental Assessment whereas, apparently, impacts to soils, water quality, vegetation, wildlife, wild horses, and recreation are not site-specific. Their analysis in Chapter 3 is totally inadequate and incomplete, as perhaps BLM found it difficult to admit the actual impacts of all the alternatives as well as the Proposed Action as continuing overgrazing, deterioration of wildlife habitat and riparian areas, and continuing negative impacts on all other resource values.

The analysis of the environmental consequences of the Proposed Action is totally non-specific and could be applied to any Resource Area in the West. It is filled with so many "may's," "possibles," "at some time in the future," "assume," and "for the purpose of analysis" as to be totally meaningless to the reader as well as to the land manager in understanding the environmental consequences of BLM actions or inactions.

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We know that BLM has some understanding of the EIS process. The statement on p.1-16 reveals "The purpose of an EIS is to discuss the environmental impacts of the alternatives including the Proposed Action. The EIS informs the decision maker of ways to avoid or minimize adverse impacts, or of ways to enhance the environment." Yet our review reveals that the Reno DEIS fails to carry out any of these stated purposes. 1) The environmental impacts are not adequately discussed because they are not adequately acknowledged by BLM. 2) On p. 3-1, the statement "...all adverse impacts were considered to be unavoidable. Mitigating measures for a given action will be discussed as part of a site specific EA and will not be analyzed in this EIS" obviates the second recognized purpose. 3) The Resource Protection alternative which could be expected to "enhance the environment" will result in insignificant improvements or no significant change in range conditions, current erosion, flooding, sediment damage, water quality, and wildlife as well as in significant negative impacts on wild horses in most allotments.

There are many other minor deficiencies in the methodology of the DEIS, especially in the Social and Economic sections. However, all deficiencies cannot be covered in one letter. We must, therefore, conclude these written comments with the statement ending our oral comments at the public hearing on the Reno DEIS last week. If we did not believe that BLM can do a better job managing the public lands and analyzing the environmental impacts of their management activities, the Toiyabe Chapter of the Sierra Club would have to become staunch advocates of the Sagebrush Rebellion, as the State of Nevada surely could do no worse!

Sincerely,

D. Strickland
Nose Strickland, Chair
Public Lands Committee



**RESOURCE
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August 20, 1982

Mr. Tom Owen
District Manager
Carson City District
Bureau of Land Management
1050 E. Williams Street, Suite 335
Carson City, Nevada 89701

SUBJECT: N-3 State Grazing Board, Comments to the Draft Reno
Environmental Impact Statement

Dear Mr. Owen:

Resource Concepts, Inc., a private consulting firm based in Carson City, submits the following comments to the Draft Reno Environmental Impact Statement on behalf of the N-3 State Grazing Board. The N-3 State Grazing Board, representing the interests of the livestock permittees of the Carson City BLM District, is concerned with the vagueness and confusing nature of the Draft Environmental Impact Statement (DEIS) regarding the proposed action. The DEIS subtly and indirectly indicates that substantial impacts may occur to the livestock industry. However, these impacts are not clearly presented. More importantly, the baseline data which is used to support the proposed action is subject to considerable question. The following text presents a summary of the N-3 State Grazing Board's specific concerns.

BLM'S EXISTING UTILIZATION DATA

The DEIS makes continued reference to "existing utilization studies". The results of these data are used as a basis for determining overuse by livestock on allotments; goes so far as to

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establish carrying capacities (Table 1-7B), and is used as supportive data for the proposed action recommendations. For example:

Page 3-1: "2) For purposes of analysis, baseline data is based on...existing utilization studies...."

Page 3-5: "Based on preliminary data from existing studies, the existing demand by livestock, wild horses, and mule deer exceeds supply of forage currently available by approximately 8,000 AUMs per year."

Page 3-23: "Under this alternative (Resource Protection), livestock numbers would be reduced to the proper use levels indicated by existing utilization studies over a five year period."

5-1 The DEIS indicates that under the proposed action adjustments will occur on "1" category allotments as soon as the EIS is final, based for the most part, on the existing utilization studies. The BLM's existing utilization monitoring studies results are presented in Table 1-7B where it is indicated that a 49 percent reduction in AUMs (actual use) is warranted. Since very significant recommendations affecting the livestock industry are based on these results, it becomes extremely important that these results are accurate in order to justify the DEIS recommendations. However, the N-3 State Grazing Board has several pertinent concerns regarding the accuracy of the existing utilization data, which indicates that these results are in fact questionable. These concerns are as follows:

1) There are inherent shortcomings associated with the methodology. The BLM's utilization monitoring method is based on mapping the degree of utilization on the allotment after the grazing

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season. The range conservationist maps the degree of utilization, determines the acreage for each utilization class, and calculate an overall allotment utilization figure by multiplying the acreage of each utilization class by a utilization factor (Figure 1). If the overall allotment utilization figure exceeds proper use, then a calculation is performed to adjust the number of livestock AUMs back to proper use. However, the overall allotment utilization figure from this method can present deceiving results. For example:

AREA A: 90 acres in size, provides 10 percent of the available forage for the allotment.

AREA B: 10 acres in size, provides 90 percent of the available forage for the allotment.

In this example, 90 percent of the acreage and 10 percent of the available forage is found in AREA A, while 10 percent of acreage and 90 percent of the forage is found in AREA B. If AREA A receives slight use and AREA B receives severe use, the overall allotment utilization figure would be 18 percent or slight.

UTILIZATION CLASS	ACRES	X	% UTILIZATION	= UTILIZATION COMPUTATION
Slight	90	X	.1	9
Light	--	--	--	--
Moderate	--	--	--	--
Heavy	--	--	--	--
Severe	10	X	.9	9
Total =	100			18

$$\frac{\text{COMPUTATION}}{\text{TOTAL ACRES}} = \frac{18}{100} = 18\%$$

According to BLM's methodology, which is applied to this example, the overall allotment is receiving slight use. This result of

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slight use is extremely deceiving when one considers that 90 percent of the forage (AREA B) is receiving severe use. In addition, the problem magnifies when the formula to achieve proper use (50 percent) is worked through. The results of the BLM methodology indicate that an increase (assuming that 100 AUMs were grazed) of 177 AUMs on the allotment is justified.

$$\frac{100 \text{ AUMs Grazed}}{18\% \text{ Utilization}} = \frac{X \text{ AUMs}}{50\% \text{ Utilization}} = 277 \text{ AUMs @ } 50\% \text{ Utilization}$$

An example of this type of error pertinent to the EIS area is presented in Figure 2. Figure 2 presents a copy of an actual utilization form for the Sunrise Pass Allotment for 1978 and is on file at the Carson BLM District Office. In this example, the allotment utilization figure is 50 percent, or proper use. However, the bulk of the forage occurring on the allotment is located in the seedings where heavy and severe use by wild horses (livestock have not grazed the allotment in at least 4 years) has occurred.

The BLM's utilization methodology considers one acre equivalent to another in terms of the degree of allotment utilization, without regard to possible differences in forage productivity between the acres. Therefore, it is unreasonable to assume that a carrying capacity figure can be established based on mapping utilization and multiplying the acreages by the appropriate utilization factor. The results of this method have the potential to provide data indicating an incorrect allotment carrying capacity which is considerably too high or too low. This discussion indicates that the BLM's existing utilization studies are unsuitable for use in Table 1-78 and as support data for adjusting livestock AUMs for "1" category allotments.

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Figure 1. BM data form for calculating overall utilization for an allotment.

ALLOTMENT BHUSCHILL CANYON

ALLOT. % UTILIZATION 80%

TRANSLAT DATE 12 APRIL 79 DATA COMPUTATION DATE 7 JAN 80

DOCUMENTED ACRES - SOURCE: URA

FED. - 44,710

WT. - 4,280

DOC. TOTAL - 48,990

CALCULATED TOTAL - 48,990

UNUSABLE TOTAL - 0

GRAZABLE TOTAL - 48,990

UTILIZATION CLASS	ACRES	x	% UTILIZATION	=	UTILIZATION COMPUTATION
SLIGHT					
LIGHT					
MODERATE	<u>4,790</u>		<u>.5</u>		<u>2,395</u>
HEAVY	<u>12,280</u>		<u>.7</u>		<u>8,596</u>
SEVERE	<u>30,520</u>		<u>.9</u>		<u>27,452</u>
TOTAL	<u>48,990</u>				<u>39,443</u>
COMPUTATION TOTAL ACRES	<u>39,443</u>		<u>80%</u>	<u>ALLOT %</u>	<u>UTILIZATION</u>
	<u>48,990</u>				

NOTES:

METHOD OF AREA CALCULATION - PLANIMETER

$$\frac{291 \text{ AUMS}}{80\% \text{ UTIL.}} = \frac{X \text{ AUMS}}{50\% \text{ UTIL.}} = 1819 \text{ AUMS @ } 50\% \text{ UTIL.}$$

5-1

Although there are shortcomings in the Key Forage Plant Method of utilization, there are in most all methods.

The District Range Conservationists have been using this method since 1975, when most of the studies were initiated. This method followed the BLM Physical Resource Studies Manual 4412 (12-12-68).

The reasons for using this specific method were: "This method is adapted to areas where perennial grasses are the key species and utilization data must be obtained over large areas with few personnel", and "Estimates are based on a descriptive term representing a broad range of utilization rather than a precise amount." [BLM Manual 4412-7-C(1)(2)].

The utilization map shows use areas, and except for the use of utilization cages, our key forage method with utilization map is close to what has been recommended by the Nevada Studies Task Group.

Our District utilization cages were not being used for utilization studies, as they had been set out in representative areas to train a range inventory crew in the use of the SCS Range sites. These SCS range sites were to be used in our SVM inventory.

Your personnel were given permission to move and use these cages when our inventory was complete. We did not have the time or personnel available during 1980-81 to use them in our utilization studies, as we knew we would be rechecking our key areas in order to incorporate our soils information.

The average overall utilization and the adjustment of AUMs to a 50% use level was used only to arrive at some number to analyze in the Resource Protection Alternative.

Adjusting carrying capacity of an allotment by using an average percentage of utilization over the whole allotment would not be a valid adjustment. We used this as a worst-case scenario and to arrive at a number of AUMs for analytical purposes only.

The method of utilization recommended by the Nevada Studies Task Group will be used in the future. Our present studies will be used only if borne out by the new studies and as a compliment to them. Total acreage and average utilization will not be used to establish stocking rates.

We have tried to separate wild horse use in those allotments where possible; however, such use is an estimate.

No livestock adjustments will be made without consideration of wild horse use. Levels of use will be set in the land use planning and CRMP for all programs. Table 1-78 does include estimated wild horse use, however, there are some errors that failed to be corrected prior to printing.

Example: Pinonut Allotment 542 AUMs actual use livestock, 285 AUMs reasonable number AUMs, 489 AUMs wild horse (after partial removal for private property) and adjusted livestock AUMs 590 AUMs, not 0 as shown. Other allotments will also be corrected. Reductions of livestock, however, in some cases does not show a corresponding reduction in wild horses. Again, this use to reflect a worst-case basis for the livestock producer and would not be considered as realistic.

Refer to Chapter 1 Errata Table 1-78.

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Figure 2. BLM Allotment Utilization form for the Sunrise Pass Allotment, 1981.

SUNRISE

Total available acres, no dual

SUNRISE
ALLOT. % UTILIZATION 50%

TRANSECT DATE Oct 1978, DATA COMPUTATION DATE 12-78

DOCUMENTED ACRES - SOURCE: URA

FED.- 17,616

PVT.-

DOC. TOTAL- 17,616

CALCULATED TOTAL- 17,600

UNUSABLE TOTAL-

GRAZABLE TOTAL-

UTILIZATION CLASS	ACRES	% UTILIZATION	UTILIZATION (COMPUTATION)
SLIGHT	5,000	10	50,000
LIGHT	0		
MODERATE	6,500	50	725,000
HEAVY	2,100	70	147,000
SEVERE	4,000	90	180,000
TOTAL	17,600		802,000
COMPUTATION		802,000 = 50	
TOTAL ACRES		17,600	

ALLOT % UTILIZATION

NOTES-

METHOD OF APCA CALCULATION - Plannette

The Sunrise allotment was not grazed by domestic livestock in 1978. An estimated number of seeded acres used this area, used heavy and some use on the shrubs. when the majority of feed is located

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2) The accuracy of the BLM's determination of the degree of use and the acreage of certain degrees of use is subject to question. Resource Concepts, Inc. (RCI), on behalf of the N-3 State Grazing Board, has conducted a utilization monitoring program for the past several years aimed at evaluating the accuracy of the BLM's mapping technique within the EIS area. The BLM's utilization mapping technique was checked by plotting RCI's utilization monitoring locations over the BLM's utilization mapping results for that same year. RCI's monitoring sites, for the most part, were conducted at locations where the BLM had previously established utilization cages (which the Bureau had not been using in their monitoring programs) and where RCI had established utilization cages. RCI's utilization results for those sites were compared to the utilization class the Bureau had delineated for that area.

The results of the comparison of RCI and BLM utilization data indicated significant differences in utilization for some allotments while others were somewhat similar. The data indicated that the accuracy of the BLM's mapping technique varies between range conservationists and possibly with the size, terrain, and accessibility of allotments (certain allotments lend themselves to more accurate utilization mapping than others). However, extreme differences in utilization results between RCI and BLM were found on several allotments. For example, the Buckeye Allotment utilization mapping results were evaluated. Table 1 presents the evaluation results for the Buckeye Allotment for 1980. Figure 3 presents RCI's monitoring sites in relation to the BLM's utilization mapping results for 1980. Twenty of the 28 RCI study site results were significantly different from BLM's utilization mapping results for 1980 for the Buckeye Allotment. In general, the Bureau's utilization classes were two classes heavier than RCI's determination for those areas on the Buckeye Allotment. This is significant since the Buckeye Allotment is an "I" category allotment which will be adjusted in livestock AUMs upon completion of the EIS based on these results.

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The utilization cages referenced were placed in the field in 1978 to facilitate the Soils and Vegetation Inventory which was completed in 1980. These cages were placed in the most common and extensive range sites within each allotment in areas felt to represent the "average" condition for each range site. The cages were intended to exclude most herbivore use (i.e., rabbits, deer, horses, livestock, etc.) but their locations were not determined by livestock use patterns, rather, by the distribution of range sites, their ecological condition, and the plant species present. These cages were not intended for use in the BLM monitoring effort, although some use was made of them for this purpose when they were located in acceptable areas by chance. This is why, to date, the Bureau has not been using all their cages in the monitoring program.

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Table 1. A comparison of RCI's utilization spot checking results compared to the RHM's utilization mapping results for 1980 for the Buckeye Allotment.

Allotment	Oage or Random Site No.	RCI		RHM
		Degree of Utilization ¹	Key Shrub	
Buckeye	10	Slight		Heavy *
	11	Light		Severe *
	34	Moderate		Severe *
	35, 36A	Light	Heavy	Severe *
	37, 38	Moderate	Slight	Severe *
	39	Moderate		Severe *
	40	Severe		Severe *
	41, 42	Moderate	Slight	Heavy *
	43, 44	Light	Slight	Severe *
	45	Moderate		Severe *
	46	Light	Slight	Severe *
	47	Light	Slight	Severe *
	48	Light		Severe *
	49	Slight		Heavy *
	50	Slight		Severe *
	51	Severe	Light	
	52	Slight		Slight
	53	Light		Light
	54	Heavy	Slight	Severe
	55	Light	Slight	Heavy *
	56	Light		Light
	56, 57	Light	Slight	Heavy *
	58	Moderate		Severe *
	RS1	Moderate	Light	Severe *
	RS2	Light	Slight	Severe *
	RS3	Severe	Slight	Severe
	RS4	Moderate		Severe *
Antelope Mountain	12	Heavy		Heavy
	14	Slight		Light
	15	Light		Light
	17	Heavy		Moderate
	18	Light		Moderate
	20	Moderate	Severe	Heavy
	27	Light		Light
	32	Slight		Slight
	RS8	Moderate		Light
	RS9	Slight	Slight	Slight
Hungry Valley	C23	Moderate		Heavy
	C24	Light		Moderate
	C26	Moderate		Heavy
Shovel Springs	C21	Heavy		Heavy
	C22	Light		Slight

¹/Own histories of RCI's study sites and supporting photographs are available at Resource Concepts, Inc., Carson City.

*Degree of utilization varies two classes or more.

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Figure 2. RCI utilization monitoring sites in relation to the RHM's utilization mapping results for 1980.

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Based on these results, BCI questions the adequacy of this technique in determining overall allotment utilization level. Inaccurate utilization class determinations and acreage calculations can greatly impact the overall allotment utilization class and can ultimately cause unwarranted adjustments in livestock ADUs.

3) The N-3 Board is concerned as to whether the BLM has distinguished wild horse use from livestock use in the utilization results. According to the DEIS, Table 1-7B represents the Bureau's existing utilization monitoring results. These utilization results provide the justification for adjusting livestock ADUs on "I" category allotments under the proposed action. However, the DEIS implies that the utilization monitoring data is for all users, not solely livestock use. The DEIS indicates that only livestock ADUs will be adjusted based on this data. If this assumption is true, can the Bureau justify adjusting only livestock ADUs to proper forage use based on data which includes horse use? For example, the DEIS estimates that there is more than a 2,000 ADU wild horse demand on the Buckeye Allotment, which would be a significant contributor to the degree of utilization recorded for the allotment. However, Table 1-7B of the DEIS would lead one to believe that the Bureau's recorded overuse would be solely attributed to livestock. As a result, the data indicates that livestock ADUs should be reduced by 44 percent.

This point is very pertinent to the Pinenut Allotment. According to the DEIS, the Pinenut Allotment should be cut 100 percent in livestock use (Page 1-13) based on existing utilization studies. However, according to the BLM's records, a substantial amount of utilization is occurring from wild horses. Figure 4 presents a copy of the overall allotment utilization result for the Pinenut Allotment conducted by the Carson City BLM. The notes on this form state that "an undetermined amount of horse use accounts for

5-3 Refer to Response 5-1.

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a substantial amount of the heavy-severe reflected in the utilization study". More importantly, the notes indicate that this horse use is ignored and the calculations for correcting back to proper use are conducted with the results recommending a 30 percent reduction in livestock ADUs. As a result, the overuse attributed to horses is resolved by reducing livestock numbers.

In addition to these three previous points questioning the suitability of Bureau's existing utilization data, it is disturbing that the DEIS does not distinguish between the Carson City BLM's utilization monitoring program and the utilization monitoring procedures recommended by the Nevada Range Studies Task Group (NRSTG). It should be emphasized that the Carson City BLM's methodology, by which the existing allotment utilization data was collected varies significantly from that proposed by the NRSTG. The NRSTG, comprised of range specialists from UNR, SCS, BLM, Agricultural Extension, etc., developed what is considered an objective, effective utilization monitoring program for Nevada. The DEIS implies that suitable utilization studies have been conducted for several years and utilization monitoring will continue under the proposed action. Hopefully, this is not to be interpreted to mean that the current utilization mapping technique will be continued as a basis for adjusting livestock numbers. Rather, it is anticipated that the monitoring procedures recommended by the NRSTG will be established during the short term and that livestock adjustments will be made based on the results of these procedures.

In summary, the N-3 State Grazing Board is very concerned with the suitability of the Bureau's existing utilization data for supporting the proposed action recommendations. It is recognized that mapping utilization on an allotment is a useful tool in AMP development, however, as previously mentioned, it presents serious shortcomings when used to determine overall allotment utilization levels and establishing carrying capacities.

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5-4

Clarification of the intent of the short term and long term management actions presented in column 1 page 1-4 of the DEIS and the modifications of the utilization approach discussed in Appendix E, Section 1 (page 5-23) appears necessary.

Currently the District's monitoring program is being modified to comply with the Nevada Range Studies Task Group recommendations. These actions will include the changes detailed in Appendix E, Section 1.

Grazing adjustments could be made through the CRMP process in the short term. Current utilization study results are the only information of this type available. However, these data would at least provide an initial starting point for the decision-making process. Also, depending on the recommendations made in the CRMP process, adjustments may be deferred all or in part until the results from the modified monitoring program are available.

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Overall allotment utilization for the Photo Plot-Measurement Method. The Photo Plot-Measurement Method is used to estimate the overall allotment utilization for the Photo Plot-Measurement Method.

DOCUMENTED ACRES - SOURCE 114

FED. - 17, 41

PVT. - 14, 900

DOC. TOTAL - 37, 39

CALCULATED TOTAL - 35600

UNUSABLE TOTAL -

GRAZABLE TOTAL - 35600

UTILIZATION CLASS	ACRES	% UTILIZATION	UTILIZATION CAPABILITY
SLIGHT			
LIGHT			
MODERATE	10,100	50	5,050
HEAVY	12,900	70	9,030
SEVERE	12,300	70	8,610
TOTAL	35,300		32,690
COMPUTATION	$\frac{35,300}{35,600} = 71$		
TOTAL ACRES	ALLOT % UTILIZATION		

NOTES -

METHOD OF AREA CALCULATION - Photo Plot-Measurement

Substantial Horse Use

The allotment was grazed by sheep from June 1, 1978 to Aug 31, 1978, when 1000 sheep are present. The allotment was 540 on the allotment (60% of range) (300 private land 10%) and 500 horses. An estimated amount of horse use occurred for a substantial amount of the day - some reflected in the utilization study.

Assuming 50% to be open utilization, and not considering the total horse use 633 horses should have been used, or 380 on the allotment range.

$$\left(\frac{900 \text{ Acres}}{71\% \text{ utilization}} \right) \times \text{Horse} = 633$$

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TREND METHODOLOGY

As indicated on Page 2-9, the direction of trend results presented in the DEIS are based on the Photo Plot-Measurement Method. This method is highly dependent upon measuring the cover characteristics of vegetation. The NRSTG states the following concerning the use cover in measuring trend:

Cover method.

a. The cover method was developed by Daubenmire to describe vegetation for his ecological classification system. It was not developed for use as a trend method.

b. Cover changes very slowly in the "closed communities" represented by most native vegetation types. Cover measurement therefore may not indicate trend rapidly enough for management decisions.

c. Estimation of cover by the proposed method is not sensitive to change. For example, most good to excellent condition sites in the big sagebrush type have basal cover of grasses of less than 5 percent. The cover classes given would be insensitive between 0 and 5 percent, where most changes would occur. Similarly, on very productive sites, this cover method would be insensitive from 5 to 20 percent, a tremendous change in basal or foliar cover. Actual cover could be determined, but this would greatly increase the time requirement and would also be subject to the problem stated in b. above.

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d. According to Tueller's results, frequency data could not be taken from the proposed cover sampling scheme because the sample size (number and size of cover estimate plots) is too small for an adequate frequency sample.

e. Use of the cover method for trend monitoring or use of cover plots for frequency determination are not recommended.

The Photo-Plot-Measurement Method employed by Carcon District for measuring trend is also greatly influenced by annual grass production and litter. An example might be, in a high spring-moisture year such as 1980 when cheatgrass production is quite high. Cheatgrass is usually cured by mid-July, at which time it is considered to be litter by the BLM. If a trend plot is read at this time, the plot's total percent litter would be quite high. Litter figures quite heavily into the Trend Index determination, resulting in an inflated Trend Index.

In a memo from the BLM State Director to the BLM Director, DSC, dated December 22, 1981, (Memorandum 4412, N-931.5), regarding comments to Draft Manual on "Rangeland Inventory, Monitoring, and Evaluation, etc.", the State Director states the following concerning the Photo Plot-Measurement Method:

.56A8c(2) Annual Grasses. Unless an allotment is to be managed as annual range, the recording of the basal cover of annual grasses should be omitted or used with reservations that qualify its limitations since this annual growth is so highly variable. This value would adversely affect the vegetation cover factor, i.e., yearly values could not be compared, with any degree of certainty, to determine any change in trend. This same thought holds true for the value of estimating litter cover of annuals.

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However, based on field observations of BLM personnel conducting trend studies in the EIS area, annual grass cover and litter was collected and included in the trend determination.

The DEIS (Page 2-9) implies that the direction in trend has fluctuated over the past 3 to 5 years. Considering the influence of climate on perennial vegetation cover, annual grass production, and litter, plus the variability in climate in recent years, would 3 years be a sufficient amount of time to accurately determine direction of trend based on this method? It would seem especially difficult to separate natural plant responses to climate from actual direction in trend in as little as a 3 year period.

Page 2-9 states, "Trend may fluctuate from year to year in relation to precipitation received...." This statement is inaccurate. Actual direction in trend should not fluctuate yearly. However, the results of measuring trend with the Photo Plot-Measurement Method will result in annual fluctuations.

The DEIS indicates that for 6 allotments without trend data, that trend was estimated based on the observation and experience of Range Conservationists. The determination of trend based on observation, or apparent trend, is of questionable worth. The BLM State Director, in Memorandum 4412, N-931.5, states the following about apparent trend:

440.2--Apparent Trend

This subject should be omitted from the manual. By definition, trend is measured over time. Attempts at collecting trend data with one time recordings are often misleading and the data is of questionable value from a management and decision perspective.

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Due to the previously discussed problems associated with BLM's trend method, it would appear that this data may be subject to inaccurate results. It is very important that trend data be reliable, since livestock adjustments will be partially based on this data.

RANGE CONDITION

The methodology shown on Page 5-21, Appendix D, Section 1, indicates that vegetation production estimates play an integral role in determining ecological range condition. These production estimates are used in at least two instances to determine range condition:

- 1) present percent composition of the various plant species is determined by using the estimated weight (production) of each plant species, and
- 2) the range condition class will be dropped one class if production of the measured site is lower than the estimated production as depicted in the range site guides. Hence, the production data directly affects the accuracy of the ecological range condition ratings.

Yet, on Page 1 and 5-23, the DEIS document indicates that production data collected during the Reno EIS Range Survey is in error and unusable in determining carrying capacity. The fact that this production data is admittedly faulty should preclude the Bureau from using it for any significant determination, not just carrying capacity estimates.

Throughout the DEIS, references to range condition are used as a basis to predict vegetation improvement, forage increases, increased wildlife, and livestock numbers, etc. Realizing that

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5-5

This holds true with what was said for past utilization; trend studies will be used sparingly and only if backed by newer data, as recommended by the Nevada Studies Task Group.

5-6

Indeed, production estimates play a key role in the determination of present plant species composition for a range site. This is true for the determination of forage condition as well as ecological condition. The action questioned in Item 2 was practiced very sparingly and, as detailed on page 5-21 of the DEIS, with due consideration to the current growing conditions (e.g., if less than average production may have been attributed to below average precipitation, no reduction in condition was made).

Managers and range conservationists conferred on this problem. Prior to the development of Chapter 3 in the Reno DEIS they decided to use the range condition information produced during the vegetation premapping effort for the analysis of impacts and thereby avoid the inconsistencies present in the Reno DEIS range survey production data.

The vegetation premapping effort was completed by experienced range conservationists (i.e., having at least one season of vegetation transecting experience in the District and previous vegetation premapping experience). Every Site Write-Up Area (SWA) was examined, and the current vegetation composition and total production were estimated and documented. These results were compared to the appropriate SCS Range Site Descriptions and the ecological condition was determined.

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5-6 erroneous data was used to make determinations on range condition raises serious questions as to the validity of any statement or predicted impacts based on these condition classes.

COORDINATED RESOURCE MANAGEMENT PLANNING (CRMP)

5-7 The DEIS indicates that adjustments will occur to the "I" category allotments based on the range study results presented in the DEIS, but the ultimate decisions concerning the degree of adjustment will be the responsibility of the CRMP group. The concept of using CRMP in this role is acceptable. However, the N-3 Grazing Board is concerned as to how CRMP will be influenced by the Bureau's baseline data. Typically, the CRMP group is highly dependent upon BLM study results to formulate their decisions. If these study results are unreliable, as they may very well be in the Mono EIS area, CRMP groups could easily be misled into making unsound management decisions. It is hoped that the shortcomings in the BLM methodology are fully explained prior to the CRMP planning process.

ADJUSTMENTS IN THE "I" CATEGORY ALLOTMENTS

Page 1 of the DEIS states:

5-8 Adjustments in use would first begin within those allotments where studies and inventory information indicate poor ecological condition, downward trend and excessive utilization above carrying capacity.

The DEIS does not clearly state which of these allotments are in poor condition, downward trend, and are receiving excessive utilization. The significance of this action is not realized until one

5-7 All data will be explained to the CRMP groups as to individual strengths and weaknesses. New data also should be available prior to decisions on all Category I allotments.

5-8 Adjustment does not necessarily mean reduction. It can also mean change in season-of-use or method of operation. Since only one of the Category I allotments have an AMP, the first efforts will be to arrive at grazing systems that may not require a reduction, or at least minimize reductions. Again, no reductions will occur without good data to justify them.

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considers that reductions could occur to 7 of the 10 "I" category allotments. By extrating data from various tables in the DEIS, the following table was developed:

<u>Allotment</u>	<u>Trend</u>	<u>Utilization (Percent reductions in livestock AUMs)</u>	<u>Condition</u>
Antelope		-51%	P
Buckeye		-44%	P
Winnemucca		-60%	P
Planigan		-34%	P
Churchill Canyon		-42%	P
Pinenut		-100%	P
Sunrise		0%	P
Paute Canyon		-48%	P
Big Canyon		-31%	P
Constantia		-100%	P

¹/Sunrise Allotment has been in non-use

* Adjustments warranted according to BLM data.

THREE-YEAR AVERAGE USE

To arbitrarily force the affected livestock operators to take reductions in licensed AUMs based solely on the previous 3 years' average use level, is unfair and discriminating. Their action will adversely impact any operator who, for whatever reason, has taken voluntary non-use of a portion of his licensed AUMs. Several permittees within the EIS area have stated that they have reduced their herd size during this period due to drought conditions.

5-9

The three year average use was used for analysis only and would not, or could not, be required as a stocking rate. Any permittee is free to activate his non-use at any time unless emergency conditions such as fire or flood were to preclude it. There is no basis to hold a permittee to the past three years active use, as this could be a reduction in preference and would require a District Manager decision with resultant appeal rights. There of course is no correlation between active use and proper stocking rate, and without proper data a reduction in preference would not stand up in court.

We do feel however, that the active use shown will probably remain about the same for the next few years. The reasons for non-use in the Reno area are generally economically caused and such conditions will probably continue. As one permittee activates more AUMs, another will take less and it will average out.

Our last three years active use is close to the six or more years preceding.

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SUSPENDED NON-USE

While the DEIS proposes to establish initial stocking rates at a level equal to the past 3 years' average use, the document does not indicate what the disposition of those AUMs which make up the difference between current preference and the 3 year average use will be. The N-3 State Grazing Board is concerned that the District may propose to hold these AUMs in suspended non-use, an action which could significantly affect rancher wealth and equity positions, thereby inhibiting their ability to secure necessary short and long term financing.

It should be noted that these "I" category allotments provide forage for 73 percent of EIS area's AUMs. If these allotments were adjusted to the levels indicated by the BLM utilization studies, the result would be a 35 percent cut in livestock use for the EIS area on the whole. The DEIS implies that this "worst case" will not occur at this degree due to the advent of CRMP.

The impacts of reductions of this magnitude must be based on sound, reliable data. However, as discussed in the BLM's Existing Utilization Data, Trend Methodology, and Range Condition sections of these comments, this data cannot be considered sound and reliable. In addition, the CRMP group may be influenced by this data, as discussed in the previous section.

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5-10 Refer to Response 5-9.

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WILD HORSE

For the most part, the DEIS underestimates impacts resulting from horse use within the EIS area. Under the proposed action, the only justification for removing horses is that the private land owner has requested removal from his private lands. However, justification should also be centered on overutilization of forage. The Sunrise Pass Allotment (Figure 2), the Hackett Canyon Allotment (Figure 5), and the Eldorado Allotment (Figure 6) are examples of allotments which have not been grazed by livestock, but which have experienced overutilization by horses. Since reductions in livestock are justified by similar data, why are horse reductions not justified by these results?

RIPARIAN FENCING

To imply that fencing is the only alternative to improve riparian areas is incorrect. Studies by Davis, 1981; Kimball and Savage, 1971; May, 1981; and Platte, 1981; etc., have shown that the effects of grazing on riparian systems vary drastically in relation to class of livestock, type of vegetation present, management practices, grazing systems, stocking rates, stream characteristics, and most important, utilization levels.

To imply that fencing is the only sure way to improve riparian habitat ignores the findings of the before mentioned authors and allows erroneous conclusions to be drawn by the readers of this document. The Bureau should include planned grazing systems, herding, water developments, fencing, etc., which are all management tools that can be used to protect and improve riparian habitat.

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5-11

There is no question that wild horse use, particularly in the Pine Nut and Flanigan areas, have had and continue to have heavy impacts on the vegetative resource.

In the case of the Pine Nut however, the removal of horses from the private lands will affect the majority of all the allotments.

Removing about 40%, or approximately 300 horses, will decrease the pressure somewhat, but continued monitoring will be necessary as will monitoring of horse use only.

Horse population numbers will be established through CRMP or the land use plan prior to the issuance of the Grazing Decisions.

5-12

Fencing is the only practical method of protecting riparian habitats from overgrazing by livestock, particularly when these habitats constitute less than 1 (one) percent of the area, as noted in the DEIS page 2-9. Buehite in the Great Basin has a grazing system been developed (and implemented for at least one full cycle) which will improve riparian areas if these are part of a much larger range pasture. Livestock, and in particular cattle, concentrate on riparian areas and will remain there until all suitable forage has been grazed. Platts (personal communication, 1982) states that riparian areas can be maintained in their present condition if forage utilization is 25 percent or less, but cannot be improved by cattle, which are the dominant livestock species in the DEIS area. See also the quote from DEIS page 3-4, Buehite and Raleigh (1978).

It was not intended to suggest that fencing is the only alternative to improve riparian areas. In the fifth paragraph, column 1, page 3-4, it states that, "Allotment Management Plans...grazing systems...periods-of-use, will provide for improvement in riparian vegetation." The discussion which follows, with the sources cited, pointed out that reduction in livestock numbers and grazing systems are not a panacea for the riparian type, and that as detailed in the other alternatives (i.e., page 3-15 and 3-20, Riparian and Aspen Communities) only fencing provides for a significant improvement in ecological condition in riparian areas.

Improvement in ecological condition in unprotected riparian habitat types was predicted in the same fashion as upland habitat types (see DEIS Appendix E, Section 2, Tables 2-2 and 2-3; and Appendix F).

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Figure 5. BLM Allotment Utilization Summary sheet for the Hackett Canyon Allotment.

ALLOT. % UTILIZATION 78% *HACKETT*
 TRANSECT. DATE *11 Nov 79*, DATA COMPUTATION DATE *14 Dec 79*
 DOCUMENTED ACRES - SOURCE: *URA*
 FED. *6,820*
 PVT. *1,310*
 DOC. TOTAL *8,130*
 CALCULATED TOTAL *8,130*
 UNUSABLE TOTAL *0*
 GRAZABLE TOTAL *8,130*

UTILIZATION CLASS	ACRES	% UTILIZATION	UTILIZATION COMPUTATION
SLIGHT			
LIGHT			
MODERATE			
HEAVY	<i>5065</i>	<i>7</i>	<i>3546</i>
SEVERE	<i>3065</i>	<i>9</i>	<i>2759</i>
TOTAL	<i>8130</i>		<i>6305</i>
COMPUTATION	<i>6305</i>		
TOTAL ACRES	<i>8130</i>		

6305 / 8130 = 78 ALLOT % UTILIZATION.

NOTES -

METHOD OF AREA CALCULATION - *area calculator*

$$\left(\frac{516 \text{ AUMs}}{1000 \text{ utilization}} \times \frac{1 \text{ AUM}}{50\% \text{ utilization}} \right) 330 \text{ AUMs} \text{ at } 50\% \text{ utilization}$$

This allotment was licensed for non-veg. The 78% use was made by wild horses.

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Figure 6. BLM Allotment Utilization Summary sheet for the Hackett Canyon Allotment.

TRANSECT DATE *27 Nov 79*, DATA COMPUTATION DATE *11 Dec 79*
 DOCUMENTED ACRES - SOURCE: *URA*
 FED. *8,910*
 PVT. *5310* Private land now fenced out
 DOC. TOTAL *15,220*
 CALCULATED TOTAL *10,110*
 UNUSABLE TOTAL *5110* Fenced Private land
 GRAZABLE TOTAL *10110*

UTILIZATION CLASS	ACRES	% UTILIZATION	UTILIZATION COMPUTATION
SLIGHT			
LIGHT			
MODERATE			
HEAVY			
SEVERE	<i>10110</i>	<i>80</i>	<i>809800</i>
TOTAL	<i>10110</i>		<i>809800</i>
COMPUTATION	<i>809800</i>		
TOTAL ACRES	<i>10110</i>		

809800 / 10110 = 90 ALLOT % UTILIZATION

NOTES -

METHOD OF AREA CALCULATION - *Planimeter*

Some sheep use border
 heavy - some wild horse use
 there were about 1500 sheep in Colorado, one band during the spring as an exchange for use in the present allotment which has been heavily grazed by wild horses.
 the same use in Colorado is not due to sheep but the wild horses in the area. There are also other uses probably not as the allotment due to the wild horses and sheep.

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Effective evaluation of problem sites, and determination of realistic alternatives, can be best accomplished by use of an interdisciplinary team working closely with the permittee. CRMP could also play a major role in riparian related issues.

COMMENTS TO ECONOMICS

Page xiii: As shown on Summary Table 4 under Livestock Grazing, it is indicated for each of the various alternatives the changes in animal production parameters will occur. By listing these changes in Table 4, the EIS appears to stress the importance of the factors to ranching enterprises. Yet, these production changes are not included in the analysis of potential economic impacts as presented on Page 6-87. The text indicates that these changes are not analyzed due to a lack of data.

This lack of data indicates that the Bureau is simply guessing as to what effect implementation of the various alternatives will have on these livestock production parameters. Summary Table 4 implies that reduced levels of livestock grazing (Proposed Action), will in fact improve certain livestock production parameters when in fact no data to support this is supposedly available. Because adequate data to substantiate and evaluate assumptions concerning changes in livestock production parameters do not exist, the information should either be developed and presented in the EIS, or all reference to possible changes deleted.

Page xiv: As shown on Summary Table 4 under Sociology, the discussions under each alternative do not constitute impacts. The text does not in any way discuss how significant reductions in income may effect rancher stability. Whether a rancher agreed with or accepted a given alternative means nothing if the full indications of the possible impact to them has not been presented.

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5-13

Staff at the Agricultural Economics Department of the University of Nevada Reno indicate that while conclusive evidence supporting precise quantification of improvements in calf crops and weaning weights on Nevada rangelands is lacking, it is suspected that they would improve. Therefore it is appropriate to indicate the direction of change but not the magnitude.

5-14

Impacts to the majority of the Socio-cultural sector were not considered to be significant.

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As is discussed later in these comments, no attempt was made by the Bureau to determine what effect a 50 percent reduction in income (as discussed on Page 3-7) might have on an operator's ability to remain in business. The socio-cultural implications of the alternatives as they may impact ranch operators and rural communities has not been addressed in the EIS. Full consideration of socio-cultural implications of implementing each alternative should be included in the final EIS as required by NEPA regulations.

Page 1-3: Table 1-3 indicates that \$735,000 and \$85,000 worth of fencing and water troughs respectively are being proposed, yet the table shows only half the cost, because that's all the money the Bureau will get. Where will the balance of costs be made up? Are permittees and other users going to be required to share in the costs? If so, these amounts need to be shown and the likelihood that all monies necessary to construct the improvements noted. No mention of the Benefit/Cost Ratio of these proposed improvements is made. Was an analysis conducted? If so, were total actual costs or those listed in Table 1-3 utilized?

We would suggest that the Bureau indicate where the additional funding to construct the fences and supply water troughs will have its origin. If this funding will come from permittees, then their willingness or ability to put up money, while at the same time being asked to significantly reduce their incomes must be analyzed. Further, the Bureau should consider what effect not constructing all range improvements listed in Table 1-3 would have on the ability of the Proposed Action to resolve problems. This review could indicate that under what are very real possibilities (lack of funds), the Proposed Action is not at all the preferred Alternative.

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5-15

The per unit costs in this table were incorrectly printed. As the errata sheet in this document indicates, fencing costs are about \$3,500 per mile and troughs are about \$500 each. The totals in Table 1-3 are correct.

Refer to Chapter 1 Errata.

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Page 1-16. Evaluation And Modification: Because short term socioeconomic impacts will supposedly be offset by long term.

Page 1-15. Evaluation And Monitoring: In addition to monitoring changes in plant composition and ground cover, the Bureau should consider monitoring the effects of implementing the Preferred Alternative on rancher stability, providing this information to the appropriate CHMP group. It is only in this way that the group will be able to determine the effect of proposed adjustments or plans on rancher stability. Monitoring the success or failure of implemented range improvements as they apply to offsetting previous AUM reductions is also essential.

Page 3-7. Economic Impacts: By combining data presented by the Bureau in Tables 2-8, 3-1, 3-2, 3-3, and 3-4, the following table can be constructed which summarize the level of adjustments being suggested in the EIS.

Alternative	Cattle Yearlong (AUMs)	Cattle High Dependence (AUMs)	Cattle-low Dependence (AUMs)	Sheep (AUMs)
Existing (AUMs)	4,300	800	200	2,130
Proposed Action	2,350	600	210	1,380
% AUM change	-45.3	-30.2	+ 5.0	-35.2
No Action	1,380	750	180	360
% AUM change	-68.8	-12.7	-10.0	-83.0
Maximize Livestock	2,600	600	210	1,000
% AUM change	-41.8	-30.2	+ 5.0	-10.7
Resource Protection	2,360	800	210	1,380
% AUM change	-45.3	-34.8	+ 5.0	-35.2

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5-16

Since each affected rancher has far more knowledge about his own economic stability than BLM does, the logical approach would be for each rancher to supply this information to the CHMP groups. This can be easily accomplished because the ranchers will be members of the CHMP groups dealing with their allotments.

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Clearly this table illustrates, as the text on Page 3-7 mentions, that significant impacts to permittees under nearly every alternative developed by the BLM will occur. It would seem entirely possible that the Bureau could have developed an alternative wherein resource conflicts were not necessarily resolved through adjustments in livestock numbers, but through intensified management; i.e., better distribution.

5-17 The discussion on Page 3-7 indicates that yearlong cattle permittees may lose as much as 50 percent of their income through implementation of the Proposed Action. Similarly the No Action and the Resource Protection Alternatives indicate that yearlong cattle permittees may face 82 and 50 percent reductions in ranch income respectively. Even under the Maximize Livestock Alternative a short term (5 years) reduction in ranch income of 35 percent is estimated by the Bureau.

5-18 Appendix L, Section 1 of the DEIS states that "no analysis of the number of ranchers that would go out of business as a result of the proposed action or alternatives was included". This was not done as the text indicates because of time, budget, and data collection constraints. As an apparent means of further justification for not considering the implicit effect of the stated alternatives to rancher stability, the text states, "It appears unlikely recommendations that would bankrupt ranchers would come out of a CRMP process". How will the CRMP group know when they are or are not going to adversely impact an operator unless the Bureau develops the data?

5-19 This section also states that, "No analysis of the impacts of range improvement expenditures was included. They are expected to remain at about current levels." The NRDC lawsuit of 1973 brought a halt to significant levels of range improvements by the Bureau until the completion of an EIS for the resource area of concern.

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5-17 footnote on page 3-7 is it stated that such impacts will occur. The text does state that the impacts analyzed are only rough approximations of what may occur. The data the commentor used to develop this table are not proposed range allocations, they represent potential levels of livestock use based on a worst case analysis as indicated in appendix L of the DEIS. With the exception of Resource Protection, the alternatives do not necessarily resolve resource conflicts through livestock adjustments. However, adjustments are a tool that could be used in the CRMP or activity planning process to resolve conflicts.

5-18 Refer to Response 5-19.

5-19 Range improvement expenditures have been occurring in the Kern EIS area as well as the rest of the Carson City District. The BLMC lawsuit did not stop expenditures on boundary lines, maintenance, or additional improvements for existing activity plans. Since range improvement expenditure analysis at the EIS level is concerned with regional economic impacts, expenditures by the District Office have essentially the same effect whether they are for improvements in the Kern EIS area or other areas of the District. Although the District is expected to shift expenditures from other areas of the District to the Kern EIS area, total expenditures are expected to remain at about current levels. Since this would have an insignificant impact on the regional economy, according to the Council of Environmental Quality regulations (1502.2) it should not be included in the EIS. Detailed analysis of rancher expenditures will be included in the benefit/cost analysis for activity plans when more specific proposals are developed.

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The baseline data utilized by the Bureau for the Reno EIS appears to be mainly from the years 1970 through 1981. During this period, no significant levels of range improvement expenditures occurred in the Reno EIS area. An analysis of the impacts of range improvement expenditures, both by the BLM and permittees must be included as they will not remain at current levels as suggested by the Proposed Action.

Page 5-85. Scope of Economic Analysis: Page 5-85 indicates that the B/C analysis will be used at the budget justification stage and not during the development of the DEIS. This is unfortunate since the long term impacts presented in the DEIS are misleading to the non-economist rangeland planners who will be planning and implementing the EIS DECISIONS. Only by discounting can the benefit of a proposed action be accurately considered during the analysis. For example, a benefit which may appear to be significant but take 30 years to realize cannot be compared to an action based on present costs. Comparing benefits and costs which have not been discounted to the same time period may incorrectly imply that one alternative is more beneficial than another.

Page 5-88. Misrepresentation of Statement-Linear Programming Models: Page 5-88 of the DEIS references a proposal by Resource Concepts, Inc., (1981) to utilize a constant year-round 1.0 AU equivalent factor for rangeland cows. Contrary to the text, Resource Concepts, Inc., never implied that a cow with calf does not require more forage than a dry cow. Rather, as is clearly demonstrated in the correspondence between Resource Concepts, Inc., and the Carson District staff (Attachments 1, 2, and 3), Resource Concepts, Inc., indicated that on the yearly average a cow unit is equivalent to approximately 1 AU and not the inflated 1.3-1.5 AU specified in the linear programming models. The 1.3-1.5 AU was used for linear programming models developed in

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5-20

economic analysis will be included as part of the planning and implementation of the EIS decisions through the activity planning process. This will include discounting as part of the benefit/cost analysis. However, this type of analysis is not appropriate at the EIS stage. The Council of Environmental Quality Regulations (40 CFR 1502.23) state that a benefit/cost analysis of the alternatives should not be included when the EIS deals with important qualitative considerations. Since the DEIS includes important qualitative considerations, it would not be appropriate to include such an analysis.

5-21

Page 5-88 of the DEIS presents an analysis of several different approaches to using conversion factors in linear programming (LP) analysis and explains why the approach adopted for the DEIS is preferable. The RCI report referenced on that page did propose a constant, year-round conversion factor for cows. These factors were presented on Page A-4 of that report. They equaled one for both cows with calves and for cows without calves. This implies for purposes of seasonal forage substitution in the linear programming analysis that a cow with a calf consumes the same amount of forage as a dry cow. Therefore this approach was not suitable for the DEIS.

Although some of the monthly conversion factors in the background data used to develop the linear programming (LP) models equaled 1.5 AUs, the actual yearly average conversion factors for cows in the LP models ranged from 1.22 to 1.28 AUs.

The conversion factors were provided by the Economics, Statistics and Cooperative Service (ESCS) under contract to BLM specifically for the Reno EIS area. According to Dr. Kerry Gee of the ESCS, the difference between the ESCS factors and those proposed by RCI is that the ESCS factors account for spillage and wastage of feed while the RCI factors do not. It should be noted that RCI staff agreed with the ESCS approach used in the DEIS at a meeting on 3/23/81.

As page 5-87 of the DEIS indicates, the benchmark herd sizes produced by BLM's linear programming (LP) models showed no statistically significant difference from actual herd sizes. Therefore, it would not be appropriate to alter the models to increase herd sizes. Such an approach would overestimate benchmark income levels. Incremental changes are affected not only by benchmark herd sizes but also by the amount of forage required to replace public land forage. Since the conversion factors proposed by RCI are lower than the factors used in the EIS, less privately produced feed is required to replace public land forage. In addition, since the RCI factors overestimate herd size, they indicate that the ranchers would be in a better financial position after potential grazing reductions than the ESCS factors do. Therefore, based on the worst case approach outlined in the EIS, it would not be appropriate to alter the conversion factors. It should be noted that the LP models used in this analysis will not be used for public land forage allocation purposes. The models do reflect the grazing use levels used by BLM in the field for stocking and licensing purposes. If grazing use adjustments are required they will be based on the approach approved by Nevada academics.

Comment Letter 5

Mr. Tom Owen
August 20, 1982

Colorado by the Economics, Statistics, and Cooperative Service which the BLM applied to Nevada. Supported by livestock production specialists from the University of Nevada, Reno, Resource Concepts, Inc., demonstrated to the Carson District BLM that a Nevada range cow, when dry, typically requires less than 1.0 AU, while with calf the forage requirement increases to approximately 1.3 AU, equating to annual average AU of 1.0.

5-21 Because the linear programming framework utilized by the Bureau determines benchmark herd sizes from available forage supplies and animal requirements, overstating forage requirements results in less animal units being raised and consequently lower ranch incomes than actually being estimated. When the alternatives are then evaluated, incremental changes are consequently of a smaller magnitude (i.e., economic impacts are underestimated). The Bureau should strongly consider allocating forage on its linear programming models in a manner similar to that approved by Nevada academia and utilized by the BLM in the field and in their licensing procedures.

CONCLUSION

In summary, the N-3 State Grazing Board is very concerned with the potential, significant impacts resulting from the proposed action recommendations. The Board feels that the data presented to support the proposed action is unreliable and at times misleading. As an alternative, it is suggested that the Bureau consult with each permittee to derive at a fair initial stocking level (as opposed to 3 year average use), implement the monitoring procedures proposed by the NRSTG during the short term, and address adjustments (if warranted) in livestock use after sufficient monitoring period.

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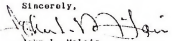
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Comment Letter 5

Mr. Tom Owen
August 20, 1982

The N-3 Grazing Board appreciates the opportunity to comment, and trusts that all due consideration will be given to the concerns outlined in this review.

Sincerely,


John L. McLain
Certified Range Management Consultant

JLM:db

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* Attachments referred to in this letter are available at the District Office.

LITERATURE CITED

- Davis, Jerry W. 1981. Livestock vs. Riparian Habitat Management - There Are Solutions. In Proc Symp. on Wildlife Livestock Relationships. Department of Wildlife Resources, University of Idaho, Coeur d'Alene, Idaho, 614 pp.
- Kimball, J. and F. Savage. 1977. Diamond Fork Aquatic and Range Habitat Improvement. U.S. Forest Service, Intermountain Region, Ogden, Utah, 19 pp.
- May, Bruce E. 1981. Practices For Livestock Grazing And Aquatic Habitat Protection On Western Rangelands. In Proc. Symp. on Wildlife-Livestock Relationships, Department of Wildlife Resources, University of Idaho, Coeur d'Alene, Idaho, 614 pp.
- Platts, William S. 1981. Sheep and Cattle Grazing Strategies On Riparian-Stream Environments. In Proc. Symp. on Wildlife-Livestock Relationships, Department of Wildlife Resources, University of Idaho, Coeur d'Alene, Idaho, 614 pp.

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August 30, 1982

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Dear Sir:

The following comments are submitted on behalf of the Nevada Cattlemen's Association on the Draft Reno Grazing Environmental Impact Statement.

General Comments

We agree with the BLM's decision not to use the range survey data to establish stocking rates from. However, the use of the last three years' average use as the beginning stocking levels would not be fair to the operator who has taken non-use for reasons other than lack of available forage. It may be that due to having had to sell more cattle than normal, the operator may have taken some non-use, or perhaps due to market conditions, the operators may have marketed earlier than normal. Regardless of the reason, the arbitrary use of the last three years average use does not set fairly for the livestock operator. We strongly feel that until monitoring data is available that shows what the actual range trend is, then the operator should be allowed to run at his existing numbers or at a level that is within his preference. If monitoring is on-going, then the livestock operator would be cutting his own throat to abuse the forage resource.

Allotment Categorization

Although we question the real need to categorize allotments, I will not address the process in general. However, we are particularly concerned with the use of ecological condition and apparent range trend to categorize allotments. According to your own definition, forage condition compares the present abundance and mix of palatable forage species available for livestock to the best production and combination of forage species a range can produce. Ecological condition is an estimate of present plant species composition and production to the climate plant community, with no regard to individual plant species palatability. Forage condition is evaluating what is actually measurable and ecological condition is management toward a goal that may or may not be possible to accomplish, and may not be feasible. We encourage the use of forage condition and actual range trend data when available from the monitoring process, but object to the use of arbitrary estimates in the form of ecological condition and apparent trends.

ATTN: NATIONAL CATTLEMEN'S ASSOCIATION

6-1

The last three years active use was used as a basis for analytical purposes only. Should a permittee wish to activate non-use he certainly can.

We do feel however, that the actual use in the Reno EIS area will remain relatively constant due to the reasons that the different levels of non-use were taken, which still remain valid. This level of active use has stayed about the same for the last 7 or more years.

Also refer to Response 5-9.

6-2

Ecological condition was only one of the criteria used in the categorization process and in most all cases was never a deciding factor in the rating. Range site potential based on the SCS was used more than ecological condition.

Also refer to Response 4-2 and Appendix K of DEIS.

BLM, Carson City District
August 30, 1982
Page 2

Grazing Treatments and Systems

6-3 From the proposals in this draft, it appears that the Reno Area BLM doesn't plan on permitting any early spring grazing. This across-the-board elimination of early spring grazing is not justifiable. According to literature (Medrick, D.W., 1967, Managing Crested Wheatgrass for early spring use, J. Range Mgmt. 20(1): 53-54) grazing certain species early in the spring with deferment in the seed stalk and seed development benefits more than spring deferment. Squirreltail is another common species in Nevada that fits into this category. Also, depending on the stocking rate, as long as there are enough plants remaining to provide seed and to replenish root reserves, spring grazing is not detrimental. Under certain management, operations may be properly grazing during early spring.

Social and Economic Conditions

6-4 Ranching Industry. The statement in this section that indicates "the Bureau in effect also controls grazing on many intermingled parcels of private range because fencing costs are prohibitive" is not entirely correct. Ranchers would often have preferred to trade private lands for public but the BLM's policy to date hadn't encouraged such land exchanges. We would encourage the elimination of the words because fencing costs are prohibitive.

6-5 We object to the deferral of payments on real estate loans from the income figures. Costs of real estate and the interest paid on this borrowed money, is a part of doing business and is a real cost that must be considered. This evaluation proposes to evaluate the economic impacts of changes in livestock grazing on the economic viability of the ranching operation. The typical ranching operation is working with an extremely small profit margin, if they are making money at all. The real estate costs are a real cost that he must pay in order to be able to continue business as is. Not including this cost leaves the reader and the BLM with an unrealistic picture of what the impacts of changes in livestock use will have on his operation. For example: Your Table 2-8 indicates that the Net Ranch Proprietor Income for Cattle-Summer use with a high dependency on public lands was \$25,000. Assuming a typical Nevada Rancher runs a 500-head operation with an average worth of \$1,500 per unit, this brings his realistic value to \$750,000. The average ranch is carrying about a 15 percent debt load. Assuming the rancher has a 20 year loan at today's Federal Land Bank rate, the total debt would be \$125,000. The annual payment would be \$16,500. These figures will probably be on the low side if you would dig into the actual situation. Including this real estate cost would reduce the Net Income figure to \$8,500. Reduction in Spring use for two months to a 500-head outfit would require hay purchases in the neighborhood of \$20,000. Additional labor costs would also have to be included.

6-3 Early spring forage is a problem on a few allotments and is one of the reasons for the proposed seedings. No blanket proposal, however, is planned to eliminate all spring grazing. Each allotment will stand on its own. Of the Category I allotments only two have spring range problems. These should be helped by seedings.

6-4 This statement backs up the inclusion of change in "land" private land grazing in the economic analysis. If such changes were not included, the economic impacts to the ranchers would be understated. BLM in effect controls grazing only on unfenced, intermingled parcels of private land. Prohibitive costs have prevented the fencing of these parcels. Therefore, this phrase should be retained.

Land exchanges are a separate issue. It is the policy of BLM to encourage land exchanges. However, all parcels are not available for exchange because of other public land values. Many parcels available for exchange have not been exchanged due to lack of funding and manpower required to process such transactions. It should be noted that the District is in the final process of completing a land exchange with one of the EIS area ranchers.

6-5 Page 2-20 of the DEIS indicates "the existence of such loans is probably the most significant single factor in determining the profitability of a ranch." It also provides specific data about actual real estate loans to EIS area ranchers. These figures should be used in conjunction with the data in the summary table to estimate impacts on ranchers with real estate loans. The reason that real estate loans were not included in the summary table is that the use of an average or typical loan is unacceptable because it distorts financial positions. Many ranchers have no real estate loans; even those with ranches with \$25,000 annual loan payments provide little or no useful data to the public or BLM, because it distorts the individual rancher's financial position. The effect of real estate loans on an individual level will be included in the activity planning process when more site specific proposals are developed.

Comment Letter 6

BIM, Carson City District
August 30, 1982
Page 3

- 6-5 We would encourage the use of real estate loans in the fixed costs considered in this D.E.I.S.

Also in this section is the adoption of the statement taken from a Nielson & Workman, 1971 report that indicates "This value (referring to the value of grazing preference) is a result of the fact that the ranchers have historically been deriving benefits greater than the grazing fees paid to the public for the use of the public for the use of the public lands." This statement is not correct and should be stricken from the final draft. The value to the grazing preference exists because without the grazing use a ranch has historically relied on the capacity of the ranch would be on the level of what the base private property would support. In ranching, as with most businesses, the capacity of the business has a direct relationship to its potential. The value of the grazing preference is real because of the additional capacity it provides. If you question this analysis, I would encourage your consultation with loan agencies such as the Federal Land Bank and the Nevada Livestock Production Credit Association. Again, we urge this statement to be omitted from the Final E.I.S. statement.

- 6-6 When considering the economics of wildlife, the rancher should be given some credit for his contribution to providing waters, salt, and predator control that benefit wildlife. Your D.E.I.S. attempts to put a value on the contribution of wildlife to the economy of the area. If such values are included it would seem only appropriate that the agricultural industry should receive some financial consideration as to their contribution to wildlife also.

- 6-7 We encourage the Bero E.I.S. team to seriously consider these comments and include the recommendations in the final statement. We would also like to emphasize the importance of establishing monitoring studies to determine actual range condition trend in the immediate future. We understand that some studies have been established in the District but until the data from these studies is available for each allotment then reliable decisions cannot be made.

Thank you for your consideration of these comments.

Sincerely,

Paul Bottari

Paul Bottari
Executive Secretary

PBak

cc Joe Fallini
Governor Robert List
Congressman Jim Santini
Senator Paul Laxalt
Senator Howard Cannon

Response Letter 6

6-6

As the costs sheet in this document indicates, this statement has been altered to reflect the commentor's concerns. A statement which includes the effect of grazing capacity on permit values has been added. However, a statement that permit values are affected by grazing fee levels has been retained. This has been generally accepted in the agricultural economics literature, not only in the Nielson and Workman (1971) study referred to in the DEIS but also in:

Godfrey, E. Bruce. "Measuring the Economic Impact of Agency Programs on Users and Local Communities". Paper prepared for Workshop on Applying Socio-Economic Techniques to Range Management Decision Making, National Academy of Science, Boise, Idaho, May 1981.

McConnen, R.J. "Public Land Grazing and Ranch Economics". Staff Paper 70-10, Department of Agricultural Economics, Montana State University, Bozeman, Montana, 1976.

Gardner, B. Delworth. "Misallocation in Grazing Public Range". Journal of Farm Economics, 1962. 44(1):50-63.

6-7

The purpose of the DEIS is to analyze the impacts of the proposed action. While it is recognized that ranchers provide an important contribution to wildlife habitat, this is not part of the proposed action and is not appropriate for analysis in the EIS.



SIERRA CLUB

CA-NV Representative
6014 College Ave., Oakland, CA 94618 (415) 654-9562
August 27, 1982

Tom Owen, District Manager
1050 E. William St.
Carson City, NV 89701

COMMENTS ON THE DRAFT EIS, PROPOSED DOMESTIC LIVESTOCK GRAZING MANAGEMENT PROGRAM FOR THE RENO EIS AREA

An Regional Representative of the Sierra Club, I work for more than 115,000 Sierra Club members in California and Nevada who share a deep concern over the management of the public lands and their resources in this region. My comments are meant to supplement comments submitted to the Bureau by the Toiyabe Chapter of the Sierra Club.

This EIS makes it clear that there is a crying need to change the management of the EIS area, for formulating alternative management strategies, for analyzing their environmental impacts, and for choosing and implementing a course of action as soon as practical. The need for such action is made clear by information in the EIS showing that:

--26 of 53 allotments, comprising 73% of the EIS area, show a declining trend in range condition (2-10,11);

--at least 56% of "small habitats" have conflicts between wildlife and grazing (2-9), and aspen groves and bitterbrush are in severely declining condition with little or no reproduction (2-13, 3-10);

--actual use is only 67% of permit preferences (1-3), indicating that permittees know that existing preference levels are not profitably possible;

--there is an estimated 8,000 AIM overuse of forage beyond sustained production levels (3-5); and,

--15 allotments are experiencing overutilization (3-9).

In addition, though no economic factors were cited among the problems the EIS lists for its area (1-1,7), the EIS reveals that "none of the typical ranches were able to make a positive return when opportunity costs are included" (2-20). Even more alarming is the projection that typical operations could lose 45% of current income in the future due to declining forage production (3-12). The non-use of at least 1/3 of the current preference in the EIS area indicates that this decline is already underway and is recognized by permittees in the area. The EIS indicates that this decline could lead to loss of 70 jobs and \$1,000,000 in regional earnings. Clearly, public lands ranching in this area is headed for economic disaster. Unless management strategies can be found to reverse these trends, ranching in the area will inevitably die out or be replaced by commercial/residential development.

Despite being able to point out these problems, the DEIS fails utterly to analyze them in any meaningful way. There is no "analysis of the management situation," or reporting of such analysis. There is no reference to the land-use plan which is supposed to have set goals for grazing management in the area.

A number of opportunities for analysis are obvious. For example, there are 7 allotments which have shown upward trend over the past 3-5 years (2-9). Why have these allotments improved when so many others have declined? The answer (or answers) should be sought out—they could well form an intelligent basis for an alternative action.

1. --ONLY THE "NO ACTION" ALTERNATIVE IS A REAL ALTERNATIVE

The key deficiency of this DEIS is the lack of real alternatives. The only alternative the DEIS describes with enough specificity so that meaningful impact analysis is possible is the "no action" alternative (continue present management). The other alternatives are far too vague and undefined to be analyzed in any meaningful manner.

The simple truth is that stocking rates and seasons of use are key variables without which you cannot predict the impacts of grazing. Analyzing alternatives which do not specify these key variables is simply illogical. Martin stated that "no grazing system can succeed if the range is overstocked." Valentine concludes that it is a "misconception that specialized grazing systems are the long-awaited panacea that will permit ignoring the other principles of grazing management. On the contrary, the evidence is overwhelming that they (systems) cannot replace the need for proper stocking rates."

The analysis of the pseudo-alternatives presented in this DEIS is based on totally unfounded presumptions. The analysis assumes development and implementation of AMPs that will produce the best possible response from range resources (3-3). What an assumption! How will the Bureau even recognize such an AMP? The question of that action would produce desirable range conditions is controversial. I suspect that the Bureau might even find that defining what range condition is desirable for its lands is controversial. But the Bureau hasn't tried to resolve this prior question or offer alternative resolutions (except insofar as it classifies lands M, I, and C₁ implying that the conditions on M and C lands are acceptable and those on I lands are not).

The analysis of alternatives based on undeveloped AMPs is totally illogical. It analyzes proposed effects (improved range conditions) rather than analyzing proposed causes (range management strategies). Only one range management strategy is set out—that of proceeding with GMP and

1. S.C. Martin, 1978, "Grazing Systems—What can they accomplish?", Rangeland Journal, Vol. 5, No. 1, p. 15

2. F.F. Valentine, 1978, "Grazing Systems As A Management Tool," in The Sagebrush Ecosystem: a Symposium, Utah State University

monitoring utilization--and that is not analyzed in any meaningful way. The analysis amounts to concluding that good results will occur solely on the basis that good intentions exist. My mother used to tell me that the road to hell was paved with good intentions.

The DEIS analysis of its alternatives also mischaracterizes the nature of CRMP as it has been practiced in Nevada. CRMP is a process that inevitably leads to compromise of goals as well as of the means to attain those goals. This is especially true in this case, where the land-use goals are not clearly set out. To conclude that CRMP will lead to results that might be expected of the best possible plan laid out by range scientists without regard for practicality and economic cost to the rancher-permittees is simply false. There will be compromise. It is an integral part of CRMP.

The analysis presented in the DEIS shows remarkably little difference between the results of its alternatives in improving lands currently in poor ecological condition (3-25). It seems that the major differences between the alternatives lie in the balance of horse to livestock use, and how much money is spent (or lost) when. This lack of range of impacts reflects the lack of substance to analyze in the various alternatives. It also shows that the DEIS fails to address the problem of poor range condition, and that its alternatives do not illustrate trade-offs between means (a management strategy) and ends (improved range conditions). I have always thought this to be the key trade-off in range management, where short-term economic hardship is often the cost of long-term improvement in range condition.

--NONE OF THE ALTERNATIVES PRESENTED IS ACCEPTABLE OR LEGAL

The lack of specific, effective action to deal with resource problems in the EIS area by any of the alternatives is directly contrary to the direction of the Federal Land Policy and Management Act (FLPMA) and the Public Rangeland Improvement Act (PRIA).

FLPMA requires the public lands to be managed in a manner that will protect the quality of ecological, environmental, and water resource values, among others (§102(a)(9)). PRIA states that the condition of those areas of the public lands producing less than their potential is unsatisfactory (§1(e)(1)), and directs the Bureau to improve the condition of those lands (§3(b)). All the alternatives presented in the DEIS fail to demonstrably do this.

--OTHER ALTERNATIVES

It is interesting that the BLM has not included a "no livestock" alternative in the DEIS. I believe this is a serious flaw. Not only is this an important alternative to learn from, as a baseline from which to compare the impacts of other levels of grazing, but in this area it is an entirely serious alternative to consider. With public land ranching economically

7-1 Refer to Response 4-1 and page 1-1 of DEIS.

Comment Letter 7

4

marginal, in an area with lucrative alternative employment available, and with high demand in the area for land for residential and commercial development, it seems very possible that the next 20 years will see all but hobby ranchers squeezed out of business. I think the public deserves a look at just what this would mean, and what its impact would be.

The DEIS should have analyzed different, specified stocking rates and seasons of use. If it had, at least the CRMP participants would have the benefit of this analysis in formulating AMPs. The trade-offs of various compromises proposed in the CRMP process would have some standards to measure themselves against.

As the DEIS stands, it does nothing to help CRMP. In fact, it does a lot to hurt it, by assuming CRMP will produce the best results conceivable--which it won't. Raised expectations will not be met, and CRMP will be blamed.

Another flaw in the DEIS alternatives is their proposed level of range improvements. Now the Bureau came up with the numbers of projects it did is a mystery. Range improvement projects must be based on site-specific needs, and not on a general theory that a good-looking list of projects will result in improved range conditions. There is certainly no backing for such a theory in any of the literature of range management.

Looking at the proposed action, I simply cannot see how the Bureau will be able to justify investments of \$61/ALM¹ in grazing rights that currently return \$1.66/year to the government (and less than half of that amount goes to the Treasury). The \$61/ALM figure does not account for increased maintenance costs or administrative costs.

I have already pointed out data in the DEIS which give good reason to believe that "no grazing" may be a realistic scenario for this area's future. I also note that the DEIS states that water is not presently a limiting factor for deer or other wildlife (2-14), so that it is clear that any positive impacts on wildlife due to range improvement projects result only from the mitigation of existing negative impacts of livestock grazing. In light of these factors, forgoing investment may be the wisest course of action from the taxpayer's point of view. In fact, the taxpayer would be better served by buying out permittees at the current \$40/ALM market value of their permits, if we consider the problem from a fiscal point of view only. I believe the Bureau should analyze such an alternative so we can see if it would have any impacts that would explain why such fiscally unsound investments as proposed in the DEIS should be pursued.

1. Investment in the DEIS proposed action--unit cost x number of units/ALMs--
\$1,236,000/20,267 ALMs (1-6)

Response Letter 7

7-2

Range improvement projects will be subject to benefit/cost analysis during the activity planning process. Such analysis includes not only returns to the Treasury but also other benefits such as those to livestock operators and benefits to the public from wildlife.

7-3

Refer to Responses 2-1 and 5-12.

7-4

This type of alternative is contrary to BLM policy, the Federal Land Policy and Management Act, and the Taylor Grazing Act. Therefore it does not meet the Council of Environmental Quality's reasonableness criteria and should not be used in this EIS.

The DEIS fails to provide other real alternative solutions to the macro problems of the DEIS area. I have already suggested an alternative based on the management of allotments with improving trend in the DEIS area. I believe the Bureau would have been able to use economic analysis to help develop other alternatives, but the economic analysis in the DEIS obscures rather than reveals new opportunities, by not taking into account factors clearly crucial to ranch profitability, such as changes in calf crops and weaning weights, changing dependence on hay, or the potential for harvesting hay for sale (5-66#2,9,11).

7-5

If I recall correctly, Arnold Bullock's article in the October, 1979 issue of Rangelands showed how increased calf weights could easily outweigh diminished herd size in a management strategy which decreased dependence on public lands in favor of increased development of irrigated pasture—in an area similar to the DEIS area.

The fact that ranchers were buying hay when the DEIS's economic model said they should not (5-66#2) clearly indicates that either the model is seriously flawed, or that the ranchers' operations harbor serious inefficiencies which the Bureau could help them correct.

7-6

—THE DEIS FAILS TO ACCOMPLISH ITS PURPOSES

I frankly find this DEIS a failure. It seems to have been done not to advance consideration of management changes by studying concrete alternatives (the proper role of an EIS), but rather to have been written only for pro forma compliance with the NRDC lawsuit judgement. Even in that aim, it fails. A structurally inadequate EIS cannot fulfill the Bureau's obligations under that judgement.

The problem really isn't one of not having adequate data. It is one of failing to consider actual management alternatives. Rather than come to grips with data problems—what are the magnitude of the data uncertainties; they can't be unlimited—the DEIS simply avoids them.

The DEIS states that the data the Bureau has on forage production is too inconsistent to use for determining grazing capacity for individual allotments (5-23)—but surely the inconsistency has some practical and definable limits! The Bureau's policy is to adjust stocking rates by monitoring utilization data. But here the Bureau states it already has 3-5 years of monitoring data on most allotments (2-9). But the Bureau goes on to say that these data are inaccurate with regard to achieving improved ecological condition on its lands (5-25).

7-7

Clearly, the Bureau has standards for data which are receding faster than we are progressing toward them. The Bureau states that it will get from the present situation on the range to a better one, but will not admit to having any way of getting there. The DEIS shows that the Bureau will never be satisfied (or secure). Perhaps that is good. But, satisfied or not with the quality of its data, the Bureau must act. It must use what it has to propose and analyze specific alternative actions, so that informed

7-5

Staff at the Agricultural Economics Department at the University of Nevada, Reno indicate that while it is suspected that calf crops and weaning weights would improve, conclusive evidence supporting quantification of such changes is lacking for Nevada rangelands. The article by Bullock referred to is based on a series of assumptions rather than conclusive evidence. This by no means indicates that Bullock's conclusions are incorrect — only that conclusive data are lacking. While it is possible that some of the EIS area ranchers could convert to hay farming, those interviewed expressed a desire to remain in the cattle ranching business.

7-6

An economic model is just that — a model. In general, the more complex a model is, the better it reflects reality. As page 5-88 of the DEIS indicates, the models used are very simplified and based on a limited number of variables. This was the result of various time, budget and data collection constraints as well as the lack of specific changes in vegetation allocations or periods-of-use. Preliminary runs of the model indicated no hay purchases, therefore it was corrected by forcing hay purchase. The fact that none of the typical ranches showed positive returns when opportunity costs are included may indicate inefficient operations from a purely economic point of view. However, as Smith and Martin's article, "Socioeconomic Behavior of Cattle Ranchers with Implications for Rural Community Development in the West" in the American Journal of Agricultural Economics of May 1972 indicates, ranching generates consumption as well as production outputs. In other words, many ranchers may be willing to earn lower returns in order to participate in the ranching lifestyle. While the DEM can help ranchers correct inefficient use of public lands, other federal agencies such as the Soil Conservation Service and the Cooperative Extension Service have the responsibility and expertise to advise ranchers on the use of their private lands.

7-7

Refer to Response 5-4.

Also, please note that the discussion in Appendix E, Section 4, page 5-25, does not reject the use of utilization data, rather, it explains some shortcomings of the present study method and details modifications (in addition to compliance with Nevada Range Studies Task Group recommendations) which will improve the District's study methodology.

Comment Letter 7

6

decisions will be made. That is the requirement of NEPA and of the
NRDC v. Morton judgement. The DEIS as it stands does not meet that requirement,
and is of little use to CRRP participants, the Bureau, the public, or the
public's land and resources.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Russell Shay".

Russell Shay
Regional Representative, The Sierra Club

W.H.O.A!

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WILD HORSE ORGANIZED ASSISTANCE
INC.

A Foundation for the Welfare of
Wild Free-Roaming Horses and Burros

August 30, 1982

P.O. Box 335
Reno, Nevada 89504
Telephone 321-3908
Area Code 702

Mr. Tom Owens, District Manager
Bureau of Land Management
1050 E. Williams Street, Suite 335
Carson City, Nevada 89701

Dear Mr. Owens:

Thank you for the opportunity to comment on the Draft Reno EIS. Our conclusion after review of the DEIS, that the proposed action and the so-called alternatives identified a significant adverse impact on wild horses. The document does not analyze in sufficient detail, those impacts; therefore you should prepare an additional environmental impact statement on wild horses as well.

Chapter I (1-1) Purpose

In the 1973 NREDO vs BLM, the suit contended that BLM's programmatic approaches were not adequate and did not comply with NEPA. To get around the 'spirit of the law' BLM has in this DEIS contrived the three alternatives of No Action, Maximization of Livestock, and Resource Protection, which are not truly different alternatives. Instead they offer only variations of the dominant use by livestock or the static quo. None of which adequately addresses the needs of other resource values.

One very good example is the 3rd paragraph on page 1-1, wherein you state "an alternative considered but eliminated from study was No livestock grazing. This alternative was eliminated because it was considered to be unreasonable, and unrealistic per Nevada Instruction Memorandum 82-53." Yet under the proposed action horses will be significantly reduced; under No Action, horses will be the same as proposed action; and under maximization of livestock wild horses would be eliminated; under resource protection, again they would be significantly reduced. You state that it is unreasonable and unrealistic to propose that for livestock, but not so with wild horses. Under PL 92-195, and regulations of 4700.0-6(a), 4710.3, 4730.1, 4730.2, 4730.3, and 4730.4 you have many more alternatives than has been given. Instruction Memorandum No. 81-145 change 2 specifically.

It appears there are no meaningful alternatives at all, but rather a deliberate attempt to maintain the static quo for livestock with wild horses paying for range improvements so they can increase livestock.



8-1 Refer to Responses 4-1 and page 1-1 of DEIS.

Comment Letter 8

Page Two

8-2

How can you categorize allotment without using the range data collected? It concerns us greatly that overall a major allotment may have 90% of its soil and vegetation in good condition and have the other 10% in rotten condition, but overlooked because of the majority. How do you know what kinds of problems you have without using the data? How can you use some of it and not all of it? It is an amazing definition of "multiple use" when you can reduce horse populations so that you can increase livestock AUMs. Nowhere in this EIS do we see a reciprocal approach with the wild horses, such as reducing the numbers and as range improves to proportionately increase wild horse use.

How can the range improvements better the wild horses' fare when you propose to either take them off completely or reduce them below viable herds? Neither fences nor cattle guards could be regarded as benefitting wild horses. But for the record, they must be modified if they are in wild horse range.

The statement of "achieve maximum forage production in favor of livestock" applies to all the alternatives in this EIS. You may have complete trust in the Standard Operating Procedures, unfortunately the public does not wherein most EA have superficial data as a justification for the action. None of the EA's that I have seen have been anything other than a guess-timate of populations and a proposal for the action. Nowhere does it analyze the data this EIS should contain. Since the public has an insufficient document in this EIS, there is nowhere where we may compare the data he supposedly gets in an EA. On page 1 you have assumed "no significant impacts would occur to visual, cultural, water quality, T & E, or AOCB; so analysis in an EA would be moot.

GROUP 1-16- Please explain exactly what you mean when you state "It is at the representation point in the Reno EIS area that various public, especially local individuals and groups, have the opportunity to become involved in GRP." What is considered "local"? I believe the public lands belong to all Americans and if participation is granted to only the local as defined by the Bureau, then the public lands are not adequately being represented.

Chapter II describes a reduction of vegetative soil cover from over grazing, yet nothing other than wild horse removal addresses the problem.

Trend 2-9

8-3

You state that monitoring over the next five years will establish the direction of the range condition, yet you have in most allotments photo plots for 3 years. What makes you believe the data collected over the next five years will be believed any more than that collected over the past three?

Wildlife 2-13

8-4

Two of the major interstate deer herds occur in this EIS area, yet there is no way for the public to tell whether special management considerations will be taken across your MIG categorization of allotments. You state good stands of bitterbrush and further down state that reproduction will not be enough to sustain these stands. What management actions do you propose to take to correct that situation? Management of wild horse numbers in critical areas will only address a portion of the problems involved; what about the entrenchment of 2-3 thousand head of sheep near the meadow at Slater Mine?

Response Letter 8

8-2

The categorization of the allotments was done using many criteria. No allotment was, or would have been, classified on present production. The only portion of our inventory that was not used was the production data for allocation of carrying capacities. This portion was in question and did have errors. The soils, vegetative composition, etc., were all used. Range site descriptions and site potentials were included in the allotment categorization.

The Category I allotments selected account for 31,861 AUMs of livestock actual use alone not to mention 5,500 AUMs of estimated mule deer use and 10,827 AUMs of estimated wild horse use. This total of 48,188 AUMs of active use is 66% of the total Reno EIS area and occurs on only 10 of the 55 allotments.

The proposal to categorize allotments, the proposed criteria, and proposed ranking of allotments has been presented at NFP open houses, EIS Scoping meetings, Multiple Use Advisory Council, and Grazing Advisory Board Meetings for public comments. No comments were received that suggested a change in criteria or allotment categories. The allotment groupings are not fixed and can be changed. Range improvements, particularly water developments, can benefit wild horses. Fences also can benefit, particularly in an area where horses might have to be removed because of drift onto private property. The construction of a fence could stop the drift, and no removal would be required.

We agree that more knowledge of the wild horse is necessary. This is one of the reasons that we only analyzed the removal of horses from private lands. It appears, based on past and present court cases, that we will have no choice in this matter. We at present have letters from the private land owners in the Pah Rah, Jumbo, and Pine Nut areas.

In the case of the Flanigan, Granite Hills-Dogskin, and the remainder of the Pine Nut units, we hope population levels and management goals can be agreed upon so that removal will not be our only method of management.

8-3

Refer to Response 5-4.

8-4

These problems have been well addressed in Chapter 2 (Mule Deer, page 2-13 and 2-14) and in Chapter 3 (Mule Deer, page 3-5).

Page three

Sage Grouse 2-14

What considerations will the BLM take on the wild horses that migrate across the Virginia City Highway from the Juniper Range to the Virginia Range or vice versa? Or do you plan for administrative ease.....? We eliminate all the wild horses anywhere near the Virginia Range, when all along the problem has been a trespass action? The law states all or part..... of public lands.

8-4

Wild horse 2-15

Again, by your own written admission, as testified in this document, the total sum knowledge of wild horses is the ability to count. It does not provide acquisition routes, habitat requirements, water access, forage needs, or even law enforcement. Nowhere does the DEIS identify what management considerations would be taken other than reduction.

Recreation 2-15

I, my family, and my neighbors are part of the recreationists, yet we do not agree with livestock management, nor your horse management. Although the area is urban, you give no consideration of the urgent needs for this increased activity for the heavy populace of Washoe County, Ormsby County or Storey County, even though these sites are recreation oriented.

Livestock Community 2-22

Now that permittees are no longer able to utilize the economic benefits of the wild horses, it stands to reason they would like them to go away. They should have thought of that at the time when they were using grazing of the horses to add to their income. Despite their persistence we are equally persistent that they will not control the other resources.

State and National 2-23,24

We do not resent placement of the management of the animals, we resent the unscientific approach to their management. It appears to be the philosophy of the BLM that everything that happens on the range will benefit livestock and if it happens to benefit other resources, fine. If not, they're not as important anyway. The historical development of water, fences, seedings, were designed with livestock in mind and only by do facts in some cases did they benefit anything else. Despite working with BLM for over 10 years, BLM still fails to recognize the real problem.

8-5

Nowhere in the DEIS is the illegal use (trespass) analyzed, yet those AUM's in addition to the permitted use have caused significant over grazing. Since the records are of public information, and it is a fact, it too should be analyzed in. I believe it was the Carson District that recently tried to convince us that a permittee was, but wasn't trespassing; he either is or isn't. Also now that the District has eliminated the Range Rider, and in addition to ineffective law enforcement, the trespass will increase.

8-6

I would like some explanation on the computation of forage for wild horses, as the DEIS does not give adult/foal ratio. Are all animals on the table computed as consuming adult forage? On Table 1-1 the wild horse demand was for 15,369 AUMs x 12 = 1280 horses; what % are foals? Considering there are five sheep per AUM plus the cattle

8-5

This has not been significant in the Reno EIS area. Only one permittee has had to be warned in the past few years, and that was a case of drifting onto another allotment and not of excess numbers.

8-6

The wild horse numbers and AUMs consumed were based on adult horses and not on foals. We also based consumption on the same basis as for cattle; mare w/foal = 1 AUM. Stud or barren mare = 1 AUM. Although many sources suggest that a cow consumes 800 pounds of air dry weight of forage per month, while a horse consumes 1000 pounds. We felt that the smaller size of the wild horse would make the 800 pound figure more realistic. We also prorated the wild horse use, as we do livestock, by the percentage of public lands. If an allotment was only 30% public land and there were 100 horses on the allotment, we used 30 AUMs rather than 1200.

There is only one cattle allotment with year-round use in the Reno EIS area. This allotment has only 96 AUMs of wild horse use and was not considered a conflict. We do agree that this is a problem in other areas.

Comment Letter 8

Page four

8-6 | there are still more than double the number of horses. Your tables
also did not show the areas of vegetation condition in map form so it
is hard to separate out the use areas. How do you separate horse
use from that of cattle use on ranges where cattle are there year round?

8-7 | Despite a sheep operation in the area, no action was made of
predator control, yet I have seen the sheepmen in the area with guns.

It says an awful lot about the district, when in fact it is
common knowledge that the Carson District has collected more substantive
data than any other district, to have been reduced down to issuing
a document of such poor quality. It certainly does nothing to enhance
the public's faith in the professionalism of the BLM organization, nor
does it correct the previous belief that nothing constructive will come
out of this EIS area either. But it is a standing testimony that BLM
has capitulated to political interest and that we had good reason not to
trust.

WAGI will not support and actively fight the proposed action
and the alternatives from becoming reality.

Most sincerely,

Dawn Y. Lapping
Dawn Y. Lapping (Mrs.)
Director

cc:
NRDC
API
ANPA
Southern Nevada Humane Society
Nevada Humane Society
Sierra Club

Response Letter 8

8-7

Predator control is not considered a significant issue to be
addressed in a grazing EIS, as the impacts do not
significantly affect the vegetative resource.

Predator control is normally a function of the Nevada
Department of Wildlife and the Fish and Wildlife Service.
The Bureau identifies areas for control through the planning
system and the actual control is administered by these
agencies.

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August 25, 1982

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Tom Owen
August 25, 1982
Page Two

Tom Owen
Carson City District Manager
1050 E. William Street, Suite 335
Carson City, Nevada 89701

Re: Reno Grazing Environmental
Impact Statement

Dear Mr. Owen:

I am writing on behalf of the American Horse Protection Association, Inc., to comment on the draft Reno Grazing EIS.

The draft is not entirely clear regarding the protection and management of wild horses in the EIS area. I do understand that under the proposed action the current population of 2,063 will be reduced by about 54% by the removal of 800 horses from the checkerboard lands in the Pah-nah and Jumbo herd areas, and about 305 horses from the Indian lands in the Pine Nut herd area. The draft apparently reserves 10,325 AUMs over the long term for wild horses, which is sufficient to support the 900 horses remaining in the study area after the removals from private lands (Summary Table 1).

However, the draft contains references to overgrazing by livestock and wild horses (e.g., at 1-1) and to the fact that wild horse numbers will be established through the Bureau's land-use planning process, including CRMP advice (e.g., at 3-6). This leads me to believe that the Bureau anticipates additional and perhaps substantial cuts in the Flanigan and Granite Peak herd units and in the balance of the Pine Nut herd unit. It is not clear from the draft whether these cuts will be temporary

or permanent; they do seem to contradict the draft's allocation of 10,325 AUMs to wild horses in the long term.

This is an area that should be clarified in the final EIS. As written, the draft leaves open the very real possibility that large permanent cuts in wild horse forage allocations will be made to free up resources for livestock. The motivation to do so is obvious -- livestock allocations will decline by about 30% over the long term to 30,618 AUMs if the proposed action is implemented. Since livestock interests are usually the most influential members of CRMP committees, it is foreseeable that they will urge that a portion of the lost livestock allocation be made up by cuts in the forage reserved for wild horses.

Perhaps more than any grazing EIS I have reviewed in the past several years, the Reno draft recognizes that overgrazing by livestock has caused serious resource problems. Even with the implementation of a rather intensive grazing management program, the expected improvement in range conditions in the EIS study area is minimal. Of particular importance is the impact of livestock on small vegetation types (DEIS at 2-9), where of the 213 areas in which conflicts exist with wildlife, wild horses are wholly responsible for only seven, and jointly responsible with livestock for only 29. Livestock are exclusively responsible for the balance.

For these reasons, the final EIS should make clear that the analysis of the proposed action contemplates a permanent, long-term allocation of 10,325 AUMs to wild horses. Wild horse numbers and AUMs are being cut severely as part of the proposed action; their removal from the checkerboard and Indian lands will free up a substantial number of AUMs on both public and private lands for livestock. Their numbers must not be cut further in order to benefit the use that is principally responsible for the deterioration of range conditions in the study area.

9-1

9-1

Response Letter 9

9-1

The horses to be removed from the Jumbo, Pine Nut, and Fish
 Bah areas are due to requests by the private land owners in
 the area. The past and present court cases on this question
 make it appear that we have little choice under the law
 except to remove them as requested.

This does leave approximately 10,300 ANME of wild horse
 demand left. This amount, however, is not reserved, as we
 do not have the data to assume that this amount of forage is
 really available on a sustained basis. We hope that through
 CNRP, wild horses and other interests can arrive at
 compromises that will establish wild horses, livestock, and
 big game usage based on sound resource data. Once initial
 stocking rates are determined, increases or decreases in
 forage will be prorated to all users.

Although past overuse of rangelands can be blamed on
 livestock, it should not be forgotten that the horses were
 considered livestock prior to 1971. In much of Nevada horses
 numbers exceeded cattle and sheep in the early mining days.

Most mining communities were completely dependent on horses
 and mules, and many thousands were grazed in the surrounding
 area. Today's wild horse is a descendant of these
 early horses.

All effort will be made to fairly allocate vegetation,
 hopefully with the agreement of all resource users.

Comment Letter 9

Tom Owen
 August 25, 1982
 Page Three

If, on the other hand, the Bureau in fact anticipates that
 the wild horse population will be reduced beyond the level
 disclosed in the draft, the draft should be re-written to des-
 cribe any other expected reductions. Without such disclosure,
 the draft is wholly misleading and makes effective comment
 impossible.

Very truly yours,

Russell J. Casper
 Russell J. Casper

Attorney for American Horse
 Protection Association, Inc.

cc: Joan R. Blue
 Mark Maguire
 RJG:bb

NEVADA HUMANE SOCIETY

August 31, 1982

Mr. Tom Owen
Cerson City District Manager
1050 E. William Street, Suite 335
Cerson City, Nevada 89701

Dear Mr. Owen:

I am addressing these comments on behalf of the Nevada Humane Society, Sparks, Nevada, with reference to the draft Reno Grazing E.I.S.

I trust these initial impressions of the D.E.I.S. will be accepted by the BLM even though they were not received by the NHS until August 30, 1982, and as such it was impossible to submit any detailed review by August 30, 1982.

I found the D.E.I.S. an extremely difficult, if not confusing, document to read. However, under the proposed reduction of some 54% of the current estimated 2,063 wild horses from Bab Rah and Jumbo herds and the proposed additional reductions from Pine Nut herd, there apparently will remain some 10,325 aums to support remaining wild horses. The confusion again lies in references to overgrazing by livestock and wild horses, (1-1) and to the fact that wild horse numbers will again be established through Bureau land use planning processes including CRMP advice. This leads us to believe that the Bureau already anticipates further wild horse herd reductions and seems to contradict the draft allocation of 10,325 aums for wild horses.

Our main concern in this area revolves around the very real possibility that (as drafted) major permanent aums in wild horse forage allocations will be made to free up Bora and more range for livestock. Since livestock interests usually are the most influential among CRMP committees, then point must be clarified.

Additional points of concern are documented in comments received by the BLM from the offices of Barrett, Hanne, Daly and Gesser dated August 25, 1982 and the Sierra Club, Toiyabe Chapter dated August 27, 1982.

Sincerely,

Dr. James Dale
Executive Director

P.O. Box Kind • 200 Kresge Lane • Sparks, NV 89431 • (702) 331-5770

10-1

Refer to Response 7-1.

Comment Letter 11

August 25, 1982

Bureau of Land Management
1050 East Williams St., Suite 335
Carson City, NV 89701
Attn.: Kelly Madigan, EIS Team Leader

Dear Sirs & Madams:

I have just completed my review of the Draft Environmental Impact Statement: Proposed Domestic Livestock Grazing Management Program for the Bono Environmental Impact Statement Area, Nevada. Overall, I thought that this EIS is the best analysis and one of the fairest treatments in a draft EIS that I have reviewed in the past few years. The study team tried to give arguments for all sides; and the Proposed Action, which I favor, was a reasonable compromise for the major categories of users: livestock, wildlife, and wild horses.

The wild horses that occupy certain portions of the Reno Management unit still find themselves a low priority. For example, in discussions of the ecology and basic requirements of the great eastern wild horse, I think I did not mention that there are going to be a lot of wild livestock or mule deer, or even chukar and sagehen. Thus, I feel that a more thorough discussion of the horse's place would have given greater credence to the document. I am also disappointed to learn that clearance of wild horses from substantial areas of the Pinetnut Range (30, Pinetnut & areas immediately adjacent) is not a high priority in the grazing plan. I believe this represents a failure on the part of BLM to protect the rights of the wild horses under the law. For example, the BLM governs the leasing of grazing privileges to ranchers. In other words, ranchers are allowed to graze their livestock on open range public lands but will not be allowed to graze their livestock on the Pinetnut Range which is owned to or are interspersed with public lands. Would they demand the removal of birds and deer if they stepped on their land? Of course not. By the same token, they should not demand the removal of wild horses simply because they are not fixed like trees but follow a free-roaming life style. I believe that the BLM uses leverage it has in governing the leasing of grazing rights in order to negotiate for a fair and equitable accommodation of wild horses on all public lands, whether they lie adjacent to private holdings or not. If cattle can free roam on private and public lands then why cannot wild horses, a national heritage species, do the same? These animals could do so if the BLM would come to their defense.

I believe that he federal cases (Judge Bruce Thompson, Roaring Springs) affecting the rights of wild horses on checkerboard lands should have been appealed by BIM or a prior negotiation with Southern Pacific entered into.

The public lands are affected by the checkerboard lands on public lands and wild out but failed due to BIM's lack of initiative. The wild horse herd areas effected by checkerboard lands affects about 8000 horses in Nevada, a substantial portion of this state's and this nation's herd.

The Maximization of livestock Alternative was an interesting comparison. But I cannot see how it could be considered a possible or a legal one. To sweep all wild horses off the public lands would be in direct defiance of the Wild Horse Act and a blatant negation of both the public's and the wild horses' rights. I think this should have been mentioned: that this alternative was not a legal alternative.

Also I feel that the negative affect of indiscriminately removing about 40 percent of the wild horses should have been mentioned under the Irretrievable losses section. My reasons are as follows: the herds affected have been in the process of coming to terms with their desert environment.

Reno-EIS-2

Downer, C.

or home, over many generations through the process of natural selection. To remove these horses indiscriminately will undoubtedly set back the conservation of the population of wild horses. The wild horses and their environment and may further be harmed by excessive hunting and most "fit" individuals, also, the sex and age ratio in the population may be skewed, sending the population into a chaotic state which will have a negative impact on the population. The wild horse and aspects of population dynamics and ecology deserve attention. I still detect an element of "negativism" toward the wild horse in this EIS, though it has been largely eliminated. The wild horse has been largely overlooked. In its place is simply an absence of discussion or a terse statement of the issue. Though 100% annual increase is certainly more realistic than 15% - 25% annual increase, certainly the wild horse biologists could have given more guidance to the public.

Illegal mustanging activities and other harassment should have been mentioned as an additional source of wild horse population attrition; and recommendations concerning this should have been made.

The treatment of riparian habitat and structural diversity related to species diversity is very good. I support the efforts to protect spring sources and representative riparian habitats as presented in the proposed plan. These areas certainly represent the most diverse habitat types. Efforts should be made to protect them from human abuse, including especially OHV's.

The grazing management plans, including holding off of livestock until areas are past seed ripening and vegetative clearing followed by seeding should allow more intensive management and better control of these areas. The use of prescribed burning as a management tool is also an option. The substantial reduction in licensed ANW's is also necessary to help the grazing unit regain its ecological stability. Since the economic impact upon ranchers is so heavy, sound alternatives to help fill the gap should be explored. These should include the harvesting of pinenut and juniper nuts when they are in season for seeding and the harvesting of piñon nuts when they are in season.

The EIS's emphasis on watershed conservation and water quality is very well placed. Indeed, from a pragmatic point of view, in the desert ranges the preservation of watersheds outweighs in importance the revenues accrued from grazing. The most fertile valley fields depend upon a constant and replenishing source of water. It is, therefore, pays to protect the riparian habitat and riparian groves and aid their reestablishment in other areas are highly commendable. However, some areas should be left to provide much needed shade for livestock and wild horses in areas where shade during the summer heat is of critical importance.

Specific Comments:

p.2-13: The early history of North America indicates that deer numbers were much less than they are today, and climax species such as horses and buffalo were present in much greater numbers. Deer have multiplied because they thrive in the mid-successional series which man has helped to foster via intensive livestock grazing (overgrazing) and vegetation removal.

p.2-14. Top paragraph: I have seen deer hung up on a 4-strand fence on the west side of Smith Valley. The deer was returning from a trip to a reservoir, which was apparently the only available watering spot during this critical summer dry period.

Beno-EIS-3

Downer# C.

p. 2-20: If only five ranchers account for over half of the total public land forage use, it would seem easier for the BLM to negotiate for exchange of use in most areas allowing for a healthier and more numerous herd of wild horses and for the sound implementation of this management plan. --If the value of AMH's is currently being adjusted upward to current market value, then why have these fees actually decreased (public grazing revenues decreased) in recent months? The political reality seems to be something other than what the public interest should demand.

p. 2-22: Attitudes: The attitude of the ranchers is very well spelled out. They are blind to their own overuse of public lands, seeing this more as a right than a problem, yet persist in blaming a small minority of wild horses for the abuses their own livestock have caused. This is a pure case of "scapegoating" and should not be tolerated by the U.S. public! The wild horse is a great enhancing value to the quality of life of all people. Those who are too blind to see their value, or the issue of justice which is present here, should not be allowed to dictate their prejudiced opinions to public land managers who must by law consider all uses and values equitably!

p. 2-23. Regional: Wild horse viewing is also among the most popular recreational activities. --Environmental legislation means Responsibility! Those who deride the law are like children who deride their parents. Certainly the law should be administered efficiently with minimum red tape. Perhaps if the local people had more respect for and understanding of the law, or if government officials had more support, it could be!

p. 2-24: You are correct in saying that the wild horse interest group is both numerous and committed. The follow-through on the original intention of the Wild Horse Act is a critical test of our legal system and man's ethics toward his fellow creature as well. If man cannot do justice by the wild horse, an animal with which he has long been associated and which simply asks for a reasonable place in this "backyard of civilization," then he will have surely failed, not so much according to man's laws, as according to those universal laws which govern us in spite of our own whims and prejudices.

There is a universal principle which is both evident and inherent in the wild horse issue. Man has been linked to the horse throughout civilization, yet the horse draws its origins from the natural world. Is man claiming precedence over the natural world? Is man claiming that the horse has no place in the natural world or that the horse cannot return to a free and harmonious existence in the natural world? Some men are claiming that the horse does not belong, believing that man "created" the horse. Others know better.

p. 3-1. Is the wild horse interest adequately represented on CRMP's and will it continue to be adequately represented when allotments are decided for the various users? I am afraid there may be a token representation, but not an adequate one.

p. 3-3. If vegetation altering techniques are to be employed and increases in livestock to eventually occur then concomitant increases in the wild horse herd should also occur.

p. 3-5. Where waters are fenced and a side trough is provided for cattle and wild horses, the BLM must insure that this side trough remains full

11-1

Page 2-20 of the EIS states only that grazing fees are being adjusted; it did not state that they are being adjusted upward. Grazing fees are based on a formula which includes cost of production. Since these costs increased substantially last year, grazing fees have decreased.

Comment Letter 11

Reno-EIS-4

Downer, C.

of water when livestock are absent from the area. I have witnessed troughs such as these neatly disassembled in order to prevent wild horses from having access to water when livestock are removed. Inspection teams must assure that this does not happen.

p. 3-6. Wild Horses. Exchange of use agreements should be made with lessees of public grazing lands so that both livestock and wild horses shall be able to disperse their grazing pressure, through free-roaming in the case of the wild horse and through rest rotation in the case of livestock.

p. 3-6. Recreation: Have all efforts to reach a compromise agreement in the Jumbo & Pahreah HUA's been exhausted? To remove all wild horses from an area where they were present in 1971 seems contrary to the Wild Horse Act, and also a significant loss in terms of a unique wild horse population, let alone the loss to wild horse viewers.

p. 3-9. If well-implemented, the proposed plan should not result in a "continued deterioration of the rangeland." However, the BLM must follow through on livestock cuthacks and truly represent multiple-use. The monitoring program and GIMP workshops which will determine future allocations must place the well-being of the public ecosystem above economic or political considerations for this plan to truly work. In other words, there must be consistency of standards and follow-through of intention. This means a strong federal government. Unfortunately, it does appear that the federal role is being weakened presently.

p. 3-10. Ecological Trend: Vegetative condition must improve to assure upward trend or to prevent downward trend; this is the conclusion I draw from this discussion and Laycock's findings. Table 2-4 then would indicate that vegetative trend is down in many allotment areas covered in this EIS. These areas are being grazed year after year without respite. Rest rotation is called for over periods of a few to several years. In the case of areas containing wild horses, expanded herd use areas is called for. The wild horses will cover a large territory, thus spreading their grazing pressure over an extensive area and allowing recovery of areas grazed in previous years. A healthy wild horse herd, meaning a healthy range, requires an extensive open range, so that overgrazing does not result. The BLM should recognize this and provide for this in wild horse herd management areas. In other words: let wild horses be wild horses and give them ample space.

Aspen: Has aspen destruction by wild horses been documented? I know of areas where aspen regeneration is prohibited by sheep and cattle herding, but do not remember where wild horses have caused this. Can you show me some examples?

p. 3-12 ff. Maximization of Livestock Alternative: This is not a legal alternative and should not have been presented as such. How could you legally clear all wild horses from their traditional areas? Clearing the wild horse out would also have a significant impact on the ecosystem, setting back the process of co-adaptation which has occurred between the life community and the wild horse within this life community.

p. 3-19: Vegetation: Use of the term "desirable" points to inherent bias in this alternative. Can man decide what belongs 100%? He should not. Rather, there should be a reasonable compromise between what Nature favors

Reno-EIS-5

Downer, C.

and what man desires. To do otherwise is to deny the natural character of the land, its climate and its floral and faunal evolutionary history.

p. 3-22. Wild Horses: This section is lacking the concerned and knowledgeable discussion present in the sections on deer, livestock, and game species. It is unacceptable to me that all "Future adjustments on the allotments concerned could be borne by the wild horses." I think you are entirely correct in stating that "there would be a significant impact to wild horses under this alternative and horse numbers could be reduced below a viable herd level." All users should share in reductions, as future range monitoring may require.

11-2 p. 3-23. Economic Impacts: Values of wildlife need not be quantified. Qualitative values are very important in their own right.

Social Analysis: I regard the diversification in livelihood source by ranchers as a wholesome trend. By proving themselves flexible, imaginative, and open to suggestion, these people would be saving their own future and the future of the land they inhabit.

State & National: I agree that the implementation of this alternative would prove a deterrent to opportunities to view and enjoy the wild horse in its natural habitat.

p. 3-25. Unavoidable Adverse Impacts: Capital value losses entailed in the proposed action are relatively small when compared to the long-term value of a healthy and stable ecosystem fostered by this plan.

Relationships...: A 40% long-term reduction in livestock and a 37% long-term reduction in wild horses under the proposed alternative; this seems like a fair compromise in existing uses, given that both major uses are being reduced proportionally. I would hope that the improvements to the range and grazing rotation plans will take fully into account the needs and requirements of the wild horse herds and that these herds will share in these improvements. Perhaps a more flexible stand on ultimate numbers of wild horses would allow these animals to realize their ecological niche more fully and more perfectly in the future and attain an eventual state of self-regulation and ecological balance, or something nearing this.

I would prefer initial reductions to be taken both in wild horse and in livestock numbers and less of the former. Otherwise, and according to the Proposed Alternative, the possibility exists that future plans will change and the wild horse population will be left diminished greatly and eventually displaced by livestock. This would demonstrate a lack of fair play on the part of the livestock industry.

--Thank you for considering my views on this proposal and please keep me informed of any opportunities to further contribute to this and other land use plans.

Cordially,

Draig C. Downer
Draig C. Downer M.S.
P.O. Box 456
Minden, NV 89423

11-2

Page 3-23 of the EIS states that the quantified analysis is limited to hunting mule deer and that many other nonquantified values could be affected by this alternative.

Comment Letter 12



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX
215 Fremont Street
San Francisco, Ca. 94105

Mr. Tom Owen
District Manager
Bureau of Land Management
1050 E. William St., Suite 335
Carson City, Nevada 89701

AUG 24 1982

Dear Mr. Owen:

The Environmental Protection Agency (EPA) has received and reviewed the Draft Environmental Impact Statement (DEIS) titled RENO EIS AREA PROPOSED DOMESTIC LIVESTOCK GRAZING MANAGEMENT PROGRAM.

EPA's comments on the DEIS have been classified as Category LO-2. Definitions of the categories are provided by the enclosure. The classification and the date of the EPA's comments will be published in the Federal Register in accordance with our responsibility to inform the public of our views on proposed federal actions under Section 309 of the Clean Air Act. Our procedure is to categorize our comments on both the environmental consequences of the proposed action and the adequacy of the environmental statement.

EPA appreciates the opportunity to comment on this DEIS and requests three copies of the Final Environmental Impact Statement when available.

If you have any questions regarding our comments, please contact Loretta Kahn Barsamian, Chief, EIS Review Section, at (415) 974-8188 or FTS 454-8188.

Sincerely yours,

John Wise, Acting Director
Office of Policy, Technical,
and Resources Management

Enclosures (2)

-1-

Water Quality Comments

The Nevada Division of Environmental Protection (DEP) has collected historical instream water quality data in the Truckee and Carson Rivers. Parameters of concern are:

- nutrients
- fecal coliform
- biochemical oxygen demand
- dissolved oxygen
- turbidity (suspended sediments)
- temperature

The DEIS has not directly addressed known water quality problems in the Truckee and Carson River systems. The Final Environmental Impact Statement should address the following issues:

1. Monitoring for the DEIS was of a limited scope and did not address the problems mentioned above. The DEIS utilized some sixty water quality sampling sites for the Reno EIS area, comprised of 55 springs, 1 well and 4 creeks. Historical sampling was not mentioned or new sampling conducted for the DEIS with regard to the Truckee and Carson River systems.
2. While the terminal reaches of the Truckee River are not within the EIS area, the Truckee River is one system. The Cut-throat (endangered) and Lahontan Cut-throat (threatened species) are affected by improper grazing practices in riparian areas. The destruction of riparian vegetation and subsequent increased erosion have contributed to increased water temperature levels in the Truckee.
3. Uncontrolled access to the riparian environments for stock animals has led to streambank and streambed erosion. This leads to increased sediment loads in the Rivers as well as modifications by deposition and aggradation in downstream reaches.
4. Based on an analysis of upstream water quality flows, magnitude and quality of inflows and downstream quality, the Nevada DEP has estimated that 80% of all non-point sources of pollution are induced by man's activities.

- 12-1 Nevada State Water Quality Standards were used in determining suitability of water uses.

Refer to Appendix B of DEIS.

- 12-2 The Truckee and Carson river systems do not comprise a significant part of the EIS area and therefore were not analyzed.

Comment Letter 12

-2-

The major non-point sources of pollution within the Carson River Basin is agriculture. Agricultural activity within the basin is principally related to beef cattle production and dairy operations. Grazing and dairy operations are major sources of animal waste within the area. These wastes are transported into surface waters by water diverted for irrigation and stockwatering purposes. The following are areas of specific concern:

- a. Concentration of livestock waste in areas adjacent to surface waters (waste deposition directly into as well).
 - b. Land application of livestock waste.
 - c. Irrigation of croplands and pastures by flood irrigation using surface water supplies. Irrigation return flows from areas of livestock confinement and waste may be expected to contain elevated levels of dissolved solids, suspended sediments, nitrates, phosphates and fecal coliform.
 - d. Known ranches with severe streambed erosion. Non-point source contributions of suspended sediments can tend to accelerate scouring and streambed erosion.
5. We have the following recommendations to make with regard to the preceding comments:
- a. Best Management Practices, including specific grazing management plans, should be developed to address cattle access to surface waters and to protect critical riparian areas and reaches with severe streambed erosion. Fencing may prevent access but grazing controls and rotations will ensure integrity of the fencing and its associated openings.
 - b. Irrigation water management and better control of irrigation application on public lands is needed, particularly for areas where flood irrigation practices are used.

Response Letter 12

12-3 Refer to Chapter 1 of the DEIS, page 1-4 discussion of CRMP.

Pesticide Comments

The DEIS does not indicate if any of the grazing area will be used for pesticide treatments of sheep or cattle. The permittee should be reminded that any treatments given must be in accordance with Federal, State, and local requirements. Care should be taken to avoid contamination of water and soil in the area. Finally, any unused portions of pesticides, rinsates, and containers must be disposed of in compliance with the Resource Conservation and Recovery Act (RCRA), the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), and State and local requirements.

EIS CATEGORY CODES

Environmental Impact of the Action

10--Lack of Objections

EPA has no objection to the proposed action as described in the draft impact statement; or suggests only minor changes in the proposed action.

ER--Environmental Reservations

EPA has reservations concerning the environmental effects of certain aspects of the proposed action. EPA believes that further study of suggested alternatives or modifications is required and has asked the originating Federal agency to reassess these aspects.

EI--Environmentally Unsatisfactory

EPA believes that the proposed action is unsatisfactory because of its potentially harmful effect on the environment. Furthermore, the Agency believes that the potential safeguards which might be utilized may not adequately protect the environment from hazards arising from this action. The Agency recommends that alternatives to the action be analyzed further (including the possibility of no action at all).

Adequacy of the Impact Statement

Category 1--Adequate

The draft impact statement adequately sets forth the environmental impact of the proposed project or action as well as alternatives reasonably available to the project or action.

Category 2--Insufficient Information

EPA believes that the draft impact statement does not contain sufficient information to assess fully the environmental impact of the proposed project or action. However, from the information submitted, the Agency is able to make a preliminary determination of the impact on the environment. EPA has requested that the originator provide the information that was not included in the draft statement.

Category 3--Inadequate

EPA believes that the draft impact statement does not adequately assess the environmental impact of the proposed project or action, or that the statement inadequately analyzes reasonably available alternatives. The Agency has requested more information and analysis concerning the potential environmental hazards and has asked that substantial revision be made to the impact statement.

If a draft impact statement is assigned a Category 3, no rating will be made of the project or action, since a basis does not generally exist on which to make such a determination.

Comment Letter 13

Response Letter 13

Tom Owen, Director,
Bureau of Land Management,
Carson District Office,
1050 East Williams Street, #335,
Carson City, Nevada 89701

Dear Mr. Owen,

August 30, 1982

This letter is in regard to the Reno Grazing Environmental Impact Statement. I am writing on behalf of the Humane Society of Southern Nevada. I am a member of the Board of Directors, and am also the Director of Wildlife Protection.

In general, I would state that there has been insufficient time to review the document. It is not clearly written. The alternatives are not creative.

Specifically, I would mention the following:

13-1

1. The EIS appears to propose a continuation of overgrazing to the tune of 8000 AUMS.
2. The categorization of allotments could be said to resemble the familiar shall game shuffle.
3. The alternatives look like variations on a theme, not different alternatives.

13-2

4. Grossly insufficient attention was given to the attractive alternative of eliminating all grazing of livestock. Reno is an urban area. Livestock grazing is not important here. Recreation, scenic value, and freedom from cow manure, destruction of riparian areas, and soiled streams should be paramount.

13-1

This was an estimated number and is discussed in Chapter 3 for purposes of analysis only.

13-2

The grazing of livestock on public lands is mandated by several laws. The Taylor Grazing Act of 1934, The Pierce Act, The Federal Land Policy and Management Act of 1976, and the Public Rangelands Improvement Act of 1978 all provide for the grazing of livestock.

The purpose of the Taylor Grazing Act was to "stop injury to the public grazing lands by preventing overgrazing and soil deterioration, to provide for their orderly use, improvement, and development, to stabilize the livestock industry dependent upon the public range..."

The Federal Land Policy and Management Act states "That the public lands be managed in a manner that will provide food and habitat for fish and wildlife and domestic animals. That the public lands be managed in a manner which recognizes the nation's need for domestic sources for minerals, food, timber and fiber..."

All the laws provided for livestock grazing as a valid and major multiple use.

The keys are proper stocking rates and proper use of the vegetative resource, so that many uses of the public lands can occur without injuring these resources.

The maximization of livestock alternative is for comparison and analysis only and is no more valid than a maximization of wild horse alternative or a no livestock grazing alternative. Each creates a single use and not multiple use as required by law.

Refer to Response 4-1 and page 1-1 of the DEIS.

- 13-3 | 5. The status of non-game animals is not addressed at all, except for birds.
- 13-4 | 6. The problems of the interstate deer herds caused by overgrazing, especially by sheep in the Pinemute, is totally overlooked.
- 13-5 | 7. The effect of predator control on wildlife in sheep grazed areas is not analyzed.
8. The alternative to minimize livestock use is outrageous in its suggestion to eliminate all wild horses. This idea totally disregards the substantial constituency for the wild horses which exists in Reno. Better, lets put a couple of ranchers and a few cows in the Great Basin Zoo and return the rest of the area to horses, wildlife and urbanites, all of whom would treat the Land far better than their predecessors.

In summary, the Reno Grazing Environmental Impact Statement is grossely deficient, does not address urban needs, and should be redone!

Sincerely,

Donald A. Molde, M.D.

Donald A. Molde, M.D.,
Board of Directors
Humana Society of Southern Nevada

DONALD A. MOLDE, M.D.
3290 Penfield Circle
Reno, Nevada 89502

- 13-3 | Nongame mammals were not considered as a group because they have such low visibility when compared with nongame birds. It is true that blacktailed jackrabbits and coyotes are often seen (and coyotes trapped), however, vegetative structural diversity (see DSIIS Nongame Birds, p. 2-14 and 15) is much more important to nongame birds than it is to nongame mammals, and livestock grazing (or overgrazing) will have a much greater impact on nongame birds than nongame mammals.

13-4 | Refer to Response 8-4.

13-5 | Refer to Response 8-7.

The Wildlife Society

Nevada Chapter



Mr. Thomas J. Owen
District Manager
Carson City District
Bureau of Land Management
1650 E. William, Ste. 325
Carson City, NV 89701

Dear Tom:

The Nevada Chapter of The Wildlife Society appreciates the opportunity to review the draft Reno Grazing Environmental Impact Statement, and provide you with our comments and concerns.

We recognize some of the inherent difficulties and constraints involved with developing such a document and the various management alternatives, however, our overall assessment is that the proposed action is little better than the existing situation, and that significant wildlife habitat improvement is not a likely result.

Although it is not our intent to be unduly critical of the Bureau of Land Management, it does appear that the hard decisions relative to livestock grazing use, which are inevitable in order to achieve improved ecological conditions, have merely been postponed or redirected to the CRMP groups.

Our specific comments to the EIS are attached, and we hope that they will be of some value to you in determining the best land and resource management strategies for the Reno EIA area.

Sincerely,

Willie

William A. Molini
President

WAMimp

Comment Letter 14

THE WILDLIFE SOCIETY, NEVADA CHAPTER
Comments on Draft Reno Grazing EIS

Summary

Page 1

- 14-1 We question the rationale of not using vegetation production data, but using range site potential, considering that vegetation production is an element of range site potential.

Page V

- 14-2 The use of existing numbers of mule deer for all but category I allotments not only represents an abridgement of the agreement between BLM and the Nevada Department of Wildlife, but does not represent an equitable resource allocation among primary uses.

Response Letter 14

14-1 Refer to Responses 5-2, 5-4 and 5-6.

14-2 It was felt that although reasonable numbers of mule deer would be managed for, they probably would not be met except in those allotments with intensive management. Allotments in Categories H and G would be managed with low intensity and would be similar to the No Action Alternative.

Chapter 1 - Proposed Action

The proposed action appears to be essentially the same as existing management. Virtually nothing is proposed to be done on 45 out of 55 allotments; no new improvements, no management systems, but rather a status quo situation. With the categories and the proposed action as described, 47% of the area will remain in poor ecological condition. We do not consider this to be a satisfactory approach. Not only will this alternative leave 47% of the area in poor condition, but it provides fewer AUMs in the long term than the Resource Protection Alternative (RPA). Based on the stated category I problems, the PA is less acceptable than the RPA.

The allotment categories are in conflict with data presented in Table 2-5 (Small Habitats). The table depicts 12 C or M allotments with at least 50% of their small habitats in conflict with livestock, yet protection or improvement of these habitats is not addressed. With the conflicts as presented in Table 2-5, some of the C and M allotments should be reconsidered for classification as I allotments.

Why are the small habitats not considered as problems in Category I allotments? On page 2-9, it is stated that 56% have conflict or are overutilized. Certainly this represents a problem.

Page 1-4 - P.A.

"Monitoring" does not seem to be an appropriate action where degradation is known to be occurring, as five years may lapse before any corrective action is taken.

Short term management action #1 is confusing. On page 3-4 it is stated that "183 acres of currently abused riparian habitat will be protected from overgrazing". Are the site specific enclosures mentioned on page 1-4, the same as the 183 acres of protected riparian habitat?

The 100' x 100' enclosures cannot be expected to significantly improve the 47% of the area that will remain in poor ecological condition with the PA alternative.

We don't consider such statements as "possible adjustments in periods of use" or "continued adjustments in livestock use levels based on utilization studies where applicable" sufficient actions to address the problems.

Page 1-7 - P.A.

We fail to see a clear difference between category M and C allotments. Are there really no conflicts within M allotments?

Page 1-15 - Management Supervision Procedures

If allotment objectives are not being met because of surplus forage, how will this situation be addressed? Will all surplus AUMs be allocated to livestock or will it be allocated equally among ungulate users, or assigned in another manner?

14-3 The small habitats are less than one percent of the total area and were deemed not significant from a grazing EIS perspective. Also, in the Category I allotments, the condition of small habitats was considered under problem 2 on page 1-1 of the DEIS.

14-4 Although the enclosures discussed cannot be expected to contribute significantly to the overall improvement in ecological condition in the Reno EIS area, they will provide for significant improvement within the riparian habitat type.

Also refer to Response 14-1.

14-5 Only 37 of the 148 sites identified in Category I allotments are identified as needing 100 x 100 foot enclosures. The majority are larger, and the range of enclosure size varies between 50 x 50 feet to 200 feet x 1/2 mile. The 23 miles of fencing shown in item 1 would protect the 163 acres of small vegetation types discussed on page 2-9 of the DEIS; this would benefit most wildlife species and not just mule deer.

14-6 The M category allotments were those allotments where very few if any conflicts occur on public lands. The public lands are generally in good condition and producing at or close to their potential.

One of the major criticisms that we receive is that some of the areas do not appear as good as we say they are, but in most cases the criticisms are on private lands and not public. We have no control or rights on private lands nor should we comment upon the condition of private lands.

All but three of the M allotments are in the Mackleeville area. Public lands in this area are limited to the alderhills, rather high and inaccessible. The Valley floors are almost all private lands and generally are the lands that the general public uses as little of it as possible. One M allotment is already being managed for wildlife values. The remaining two are receiving proper use and have not known conflicts of significance.

The C allotments are placed in that category for various reasons, some of which may have little to do with resource conditions or conflicts. Many of the C allotments no longer really exist except on paper and will be dropped in the HFF III. Since this is a grazing EIS and these allotments receive no grazing, no conflicts or impacts are said to exist. Some of the allotments are in the C category prior to moving to an I when certain temporary things change.

The allotment classification is not a fixed situation, and allotments can be moved. Should an "M" allotment prove to be deteriorating or should conflicts occur, it can well go to an I or a C and then to an I. The goal of course is to eventually get all allotments into the H category.

Refer to Appendix K of the DEIS.

Response Letter 14

14-7

If surplus forage occurs it will be prorated to all ungulate users, and possibly other users as well. To say equally distributed would not be correct as the type and location of the surplus forage will have a bearing on the allocation. An example would be a surplus of browse on an allotment with mule deer, wild horses, and cattle. The majority of this would be reserved for deer, and decreasing amounts for cattle and horses. Conversely, if the surplus was primarily grasses, the cattle and horses would get the larger share.

Chapter 2

Page 2-1

If "significant" erosion occurs in "sensitive riparian habitat areas", this should be listed as a problem. The same is true for flooding due to deteriorated watershed conditions on public lands.

14-8

Eighty-three percent of the water resources in the area do not qualify as treatable drinking water due to TDS. Why wasn't this identified as a problem? Is the reason for the untreatable condition deteriorated watersheds?

Page 2-6

14-9

Since the EIS states that sixty percent of public lands occurring in high potential range sites are in poor condition, and this is caused by "improper periods-of-use, and overutilization by livestock and wildhorses", why does the PA not call for changes in livestock numbers?

Five percent of the riparian areas are in good condition, the remainder (95%) are either in fair or poor condition. Are all the poor and fair condition areas included in Category 1 allotments?

This same comment applies to aspen communities (Page 2-9).

Page 2-13

14-10

Interchanging use of the words key and critical is confusing.

What is an allotment type as compared to a habitat type?

14-11

What is the cause of the poor bitterbrush seedling establishment and how will this be remedied by the PA?

Page 2-14

14-12

What steps will be taken to protect the sage grouse lek site? There are no specific measures mentioned to protect critical sage grouse habitat.

Page 1-16 - Kind of Operation

If the photo plots show variation in forage production, on what basis will livestock reductions or increases be made?

Salting is also a useful tool in distributing cattle.

Page 2-20

14-13

We feel that the economic value of wildlife is understated.

14-8

This was not identified as a problem because TDS levels met requirements for livestock and wildlife watering. Refer to page 2-3 under Water Quality of DEIS.

14-9

Not all of the poor and fair condition acres of the riparian and aspen habitat types are included in the Category 1 allotments. These are important habitat types, but many other factors were considered (besides current ecological condition) when allotments were assigned to management categories.

Also refer to Appendix K of the DEIS.

14-10

Refer to Chapter 2 Errata.

14-11

This was discussed on page 2-13 of the DEIS. Remedies are covered on page 3-1, item 1; and page 3-5 under the Mule Deer discussion of the DEIS.

14-12

There are no special protective measures for lek sites if these remain in the status quo. If, however, vegetation control methods such as spraying or seeding are considered, the habitat guidelines prepared by the Western States Sage Grouse Committee should be consulted and followed.

Sage grouse habitat would be protected by fencing.

Refer to discussion on page 3-5 of the DEIS.

14-13

As page 2-20 of the DEIS indicates, "Due to lack of data the full contribution of wildlife to the economy of the EIS area cannot be estimated".

Chapter 3

Page 3-2

How can a significant decrease in erosion, flooding and sedimentation be expected under the P.A., when it is stated that 47% of the area will remain in poor ecological condition, and cattle will be grazed at existing numbers at least for the next five years.

The term significant needs qualification.

Page 3-3

We question the appropriateness of employing monitoring as a solution to a problem and it seems that inevitable decisions are being postponed.

Paragraphs 3 and 4 on page 3-3 need clarification. The documents states in paragraph 13, "at some time in the future...more intensive management action may be implemented...maintain or improve vegetation condition and trend."

In paragraph 4, "possible adjustments in periods-of-use...will help meet the physiological requirement of key management species". "...it is assumed that these adjustments will be made on more than half of Category 1 allotments to prevent further deterioration of the vegetation resource". In both of these statements the P.A. is supported as desirable based on something that may happen sometime in the future.

Why will the use of current study results and methods of measuring grazing intensity to adjust stocking rates result in less than optimum management for improving vegetation condition and trend?

Page 3-4

We find the continuation of overutilization of riparian habitats unacceptable. We do not expect riparian areas to improve under current management.

Page 3-4, Paragraph 6

Although this information is factual, strict utilization levels must be maintained (i.e., no more than 55%).

Previous discussions in the text have centered on fencing only 100' x 100' areas. Now you address the fencing of stringer meadows and streambanks. Some clarification is called for.

The last paragraph on page 3-4 is an admirable thought, however, there is doubt in our minds that such improvement is likely. If aspen sites are severely limited in size and distribution, use by livestock will continue. These are highly preferable areas and use by livestock, wild horses and big game is inevitable.

Page 3-5 - Mule Deer

Here is to be found the first indication of how much the range is currently overutilized (by approximately 8,000 AUM's per year). Why was this information not exhibited prior to this section?

14-14

To clarify paragraph 3, it must be pointed out that monitoring plans will be prepared for all allotments within the Reno EIS area. Plans may be very simple for some Category M and C allotments, but it is assumed that if vegetation condition deterioration is determined, some management actions will be taken (perhaps more intensive than present management) to halt this deterioration or even improve ecological condition. Examples of possible management options include modification of periods-of-use, two months rest each spring, additional range riding to improve livestock use distribution, etc.

In most cases, past monitoring studies, plus the new procedures as proposed by the Nevada Studies Task Group, will allow adjustments if necessary by the time the grazing decisions are due. In the case of the 1 allotments, decisions are due approximately 17 months after the Final EIS. Assuming that this will occur 17 months after September 30, 1982, that would give the 1982 grazing season and 1983 grazing season for two seasons of monitoring using the new procedures. This plus the past studies should give some good data for recommending adjustments. Since all adjustments must be phased in over a 5 year period, additional monitoring will be available at the 3 year level for a reevaluation as required by law.

Also refer to Appendix E, Section 1.

14-15

Refer to Response 14-5.

14-16

Refer to Response 13-1.

Comment Letter 14

Response Letter 14

14-17

Mule deer numbers would increase over the long term within Category I allotments. What will happen to the deer numbers within the C and M allotments?

Page 3-5 - Sage Grouse

It seems that sage grouse habitat will improve only if it occurs within Category I allotments. Do all of the sage grouse areas occur within Category I allotments?

Page 3-6 - Nongame Birds

14-18

This section is confusing. First the PA will allow continued decline of the small key habitat, with a subsequent negative impact on nongame birds, but then fencing will bring about an improvement.

Page 3-6 - Recreation

Why is the increase (in the long term) of 4,176 AUM's for deer, only considered slight?

Page 3-19 - Resource Protection Alternative (RPA)

We prefer the RPA over the PA. Why was it not selected as the BLM's preferred alternative? Impacts to soil and water will be the same between the PA and RPA. In the long term there will be a 100% increase in AUM's and less acreage will remain in poor ecological condition. All the maybes and possibilities within the PA are changed to will be's within the RPA. Riparian and aspen communities will be better off and mule deer numbers would increase to reasonable numbers.

Page 3-25 - Unavoidable Adverse Impacts

We feel that the NAA and the PA are the same. Unavoidable Adverse Impacts in paragraphs 1, 4 and 8 are the same for NAA and PA.

Page 3-26 - Irreversible or Irrecoverable

14-19

We feel that under the PA there will be a irreversible or irretrievable loss of wildlife habitat (i.e., aspen, riparian and other small habitats). This needs to be addressed.

14-17 Refer to Response 14-2.

14-18 While it is true that nongame bird populations would increase over the long term if 23 miles of habitat protection fence were constructed, it is also true that small habitats which are inaccessible or impractical for fencing and maintenance will be lost. We cannot predict how many of the unprotected small habitats would be lost.

14-19 Refer to Response 14-18.

Natural Resources Defense Council, Inc.

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E. Spang, State Director	Kelly Madigan
Bureau of Land Management	EIS Team Leader
300 Booth Street	Carson City District Office
P.O. Box 12000	1050 E. William Street
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Reno, Nevada 89520	Carson City, Nevada 89701

Re: Draft Environmental Impact Statement/Proposed
Domestic Livestock Grazing Management Program
for the Reno Environmental Impact Statement Area.

Gentlemen:

I have reviewed the above-captioned draft environmental impact statement (EIS) and submit the following comments on its contents on behalf of the Natural Resources Defense Council, Inc. (NRDC).

As its title indicates, the draft EIS purports to deal with a proposed grazing management program for the area involved. It also purports to comply with the requirements of the National Environmental Policy Act of 1969 (NEPA). See, p. 1-1. In fact, the document does neither of these things. It does not deal with a proposed management program, because none has been developed. And, it certainly does not comply with the requirements of NEPA as applied to the administration of livestock grazing by the Bureau of Land Management (BLM). In particular, the draft does not address site-specific management actions, as NEPA requires. In addition, it does not deal with properly selected alternatives and fails to contain an adequate impact analysis for the "alternatives" that are included. Finally, the draft does not contain relevant and necessary information, including, for example, information about the applicable land use plan.

Notwithstanding its inadequacies, which are discussed in detail below, the draft EIS reveals that there are serious resource problems involving livestock in the Reno EIS area. These problems include, for example, over-utilization of vegetation, too early grazing, season-long grazing, degradation of riparian, aspen and other wildlife habitat areas, and soil

E. Spang, State Director
Kelly Medigan
August 27, 1982
Page Two

erosion. Pp. 3-9 to 3-11; Summary Table 4. The draft also reveals that, as the result of these and other problems, the publicly-owned resources of the area have been, and are being, adversely impacted. By the Bureau's own estimate, 62% of the EIS area is in need of "improvement," while only 6.3% is satisfactory. See, e.g., Summary Table 2. Finally, the draft clearly reveals that there is a real need for improved management of grazing in this particular area of Nevada. As such, the document confirms prior acknowledgements by the Bureau of the inadequacies of its grazing management in Nevada and the need for change. See, draft and final versions of the "Nevada Report" -- Effects of Livestock Grazing on Wildlife, Watershed, Recreation and Other Resource Values in Nevada (1974); former State Director E.L. Rowland's January 23, 1976, letter to "range users."

Despite the clear and longstanding need for remedial changes, however, no changes in current management have been proposed for any allotments in the Reno EIS area -- not even for those that are concededly in need of improvement. Instead, the draft deals with a proposal to group allotments into one of three broad categories -- M, I & C. This categorization proposal is plainly far removed from proposed solutions to existing problems and actual decisions about grazing practices for specific allotments. See, e.g., P. 1-4. As such, the proposal ignores not only the need for change and NEPA's general purpose. See, e.g., Council on Environmental Quality, Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act, 40 C.F.R. § 1500.1. It also ignores the specific purposes which grazing EIS's are to fulfill. See, NRDC v. Morton, 388 F.Supp. 829 (D.D.C. 1974); NRDC v. Andrus, 448 F.Supp. 802 (D.D.C. 1978). Finally, the categorization proposal ignores the fact that compliance with the opinion and final judgment in NRDC v. Morton, supra, requires that proposed

Although the draft sets out the criteria that were used to categorize the allotments in the EIS area, it provides no explanation of the source of these criteria or the method by which they were derived. Additionally, the draft provides no site-specific applications of the criteria to any of the allotments, thereby preventing readers from reaching any independent determinations regarding the categorizations proposed.

15-1

Page 1-4 of the DEIS states that various changes in current management could begin during the short term (0-5 years) in those allotments where change is warranted. An integral part of this is the grouping all allotments in to M, I and C. Table 1-9 page 1-17, and the discussion of the implementation process on pages 1-16 to 1-18 indicate that those allotments in Category I would have top priority for management change. Also, the proposed solution to existing problems as discussed in chapter one are based on the categorization of allotments with the main problem areas being in those allotments selected for intensive management (Appendix K, DEIS).

According to Washington Office Instruction Memorandum 82-29, dated March 5, 1982 and titled Final Grazing Management Policy, the Bureau will implement Selective Management through categorization of allotments into M, I and C.

Decisions concerning the management of specific allotments will be made through the Coordinated Resource Management Process as directed in Instruction Memorandum 80-81-281 dated May 28, 1981 and titled Minutes of Program Management and Policy Meeting, 5/14-16/81.

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decisions about actual grazing practices be addressed in EIS's, not proposals to place lands in one category or another. See, e.g., 388 F.Supp. supra at 832, 834, 841.

Moreover, even if one were to assume that decisions regarding the actual management actions needed to remedy existing problems in the EIS area will be arrived at through the "Coordinated Resource Management Process" (CRMP) within 17 months after the final version of this EIS is completed, the EIS would not satisfy the court order in NRDC v. Morton, supra, or the requirements of NEPA. The court's judgment requires that specific decisions be addressed in EIS's, and also that they be addressed according to a certain schedule. Even if the 17-month deadline were met, the resultant specific decisions would not have been analyzed in any EIS, let alone one meeting the EIS schedule.

2/ CRMP is touted as a means of allowing the public to be involved in BLM decisionmaking. See, e.g., p. 7. In fact, as experience to date in Nevada clearly reveals, the process excludes many members of the public, especially those who lack either a direct economic interest in decisions or employment that compensates them for attendance at CRMP meetings.

15-2

3/ The EIS in fact contains nothing which would support such an assumption. For example, although it states that the 17-month deadline for decisions will be met "unless funding and workforce are insufficient," it provides no estimate of the funds and personnel necessary to meet this deadline. Nor does it provide an estimate of the likelihood that these funds will be available. Such estimates are essential, given the agency's current budget problems, to say nothing of its past problems. Similarly, the draft contains no assessment of the likelihood that the necessary decisions will, in fact, be made even if the funds or personnel are available. Such an assessment is necessary given the failure of Nevada BLM to comply with previous deadlines for post-EIS decisions. Thus, for example, the first five decisions for the Caliente EIS area were issued only last month -- at least one year past the deadline in effect when that EIS was completed. Lastly, the EIS contains no assessment of whether the kinds and amounts of data the Bureau now feels it needs to make these decisions will be available within the prescribed time period. Such an assessment is necessitated by the draft's suggestions that needed data will not be available by then. See, e.g., Appendix E, Section 1, p. 5-25.

15-3

15-2 Refer to Response 15-1.

15-3 Refer to Responses 5-4 and 7-7.

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In addition to failing to deal with the kinds of site-specific grazing use proposals that the court's judgment requires, the draft EIS fails to deal with properly selected alternatives. The Reno draft purports to consider three "alternatives": "No Action, Maximization of Livestock, and Resource Protection." P. 1-1. It does not include a "no grazing" alternative, ostensibly on the ground that that option is "considered to be unreasonable and unrealistic per Nevada Instruction Memorandum NV-82-61." Id.

Consideration of the "no grazing" alternative is required by NEPA. It is required not because anyone really believes that the Bureau is likely to eliminate grazing in an entire EIS area. Rather, its consideration is required in order to provide a baseline against which to compare the environmental impacts of all other alternatives. The need to consider the "no grazing" alternative was acknowledged in connection with the first grazing EIS prepared by the Bureau and is affirmed by the agency's current range EIS policy. Indeed, the "no grazing" alternative was included in the two most recent draft EISs on grazing management in Nevada, both of which were released only weeks before the instant draft.

The "alternatives" that are included in the EIS are inadequate. First, they do not involve an adequate range of livestock levels. Only two specific levels are considered: the last three years average licensed use (included as part of two alternatives) and the categorization proposal^{1/} and a lower level (included as part of the "Resource Protection alternative"). See, Summary Table 7. Clearly, consideration of only those levels is insufficient to allow readers to understand and evaluate the trade-offs that are involved in authorizing livestock numbers at any level.

In addition, the "alternatives" included are not true alternatives, as required by NEPA. Instead, they are basically variations on one option -- maintenance of the status quo for livestock, resulting in continued overgrazing and resource degradation. See, e.g., Summary Tables. Where differences exist, they are plainly not genuine options. The "Resource

^{1/} The Bureau's analysis of these alternatives presumes changes in stocking rate, but the agency has refused to commit either to specific changes or even to a process that would guarantee that needed changes will, in fact, be implemented.

15-4 Refer to Response 4-1 and page 1-1 of DEIS.

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- 15-5 Protection alternative" for example, involves a level of livestock use that is based on already rejected data, ² periods of use that were developed "for analytical purposes only," p. 1-12, note 6, and "range improvements" that are clearly illustrative since they are wholly unexplained and non-site specific. ³

The draft's analysis of environmental impacts is inadequate. According to the EIS, implementation of the categorization proposal will produce certain environmental benefits. See, e.g., Summary Table 4. It is plain, however, that these benefits are predicated upon the implementation of as-yet undeveloped grazing management practices, including "proper" stocking levels, grazing systems and utilization levels. ⁴ For example, the predicted improvements in ecological condition, forage condition and trend in Category I allotments under the "proposed action" are explicitly based on assumptions:

⁵ The explanation provided for rejection of the date on which the livestock numbers included in the lower level "alternative" were based is extremely unclear. See, Appendix E, Section 1, p. 5-25. To the extent that the Bureau has a problem with available utilization data, the Appendix suggests quite plainly that its cause is the selection of incorrect indicator species. To resolve that problem, the agency should select a species which is truly representative of the climax plant association, rather than a subordinate species. Or, to use the terminology of the Soil Conservation Service, a decreaser species, rather than an increaser species should be selected as the key species. Based on the information given in the example, a PUF of 20% would better approximate an acceptable use of Sandberg bluegrass, while a PUF of 50% may apply to Thurber needlegrass.

⁶ In fact, the draft provides no satisfactory rationales or specific implementation sites for any of the "range improvements" associated with the "alternatives" considered. The BLM can hardly believe that merely including a list of these improvements and an assertion that they are designed for multiple use purposes is all that NEPA requires. See, e.g., Table 1-5, note a, p. 1-9.

- 15-6 ⁷ Even with these assumptions, however, it is clear that these benefits will be limited in areal extent, notwithstanding the investment of \$800,000 in public funds, and will not include elimination of overgrazing or prevention of continued degradation of critically important riparian areas. See, e.g., p. 2-9. It is inconceivable that such an investment could have an acceptable cost/benefit ratio, let alone a favorable one. It is also inconceivable that the Bureau could flatly refuse to consider any measures to mitigate the residual adverse impacts. See, p. 3-1. Cf., CEO Regulations, §§ 1502.14(f); 1502.16(h).

15-5 Refer to Responses 5-6 and 7-7.

15-6 As page 1-15 of the EIS indicates, benefit/cost analysis will be performed on improvements required to implement new allotment management plans as well as other activity plans. At present, data are insufficient to determine benefit/cost ratios on such projects.

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"This alternative assumes the implementation of ANPs and/or revision of ANPs in 10 allotments in Category I (Table 1-1). It is assumed that all grazing systems in these ANPs will be tailored to fit the vegetation range site potentials, climate, growing seasons and the management objectives of the allotments in which they are implemented." P. 1-3. (Emphasis added.)—3

Similarly, the draft even predicts "some" improvement in ecological and forage conditions in Category M and C allotments under the "proposed action," based on the "assumption" that "revised monitoring and study procedures will be implemented" as well as on the "possibility" that some wholly unspecified management actions "may" be taken. Appendix E, Section 2, p. 5-29.

This approach to impact analysis flatly ignores the Bureau's clear obligations under NEPA. The BLM simply cannot ask readers to assume that needed, but as-yet-unknown management actions regarding numbers, seasons of use, systems, etc. will be properly developed and implemented. The whole point of an EIS is to analyze specific actions to see if they will -- or will not -- have desirable effects. This EIS simply and erroneously asks readers to believe that the Bureau's good intentions are enough to ensure desirable effects.

To be adequate, a grazing EIS must include not only properly selected management proposals, properly selected alternatives and an adequate impact analysis. It must also include an analysis of the applicable land use plan or MFP, an explanation of the reasons underlying the management proposals and sufficient resource data to allow impacts to be assessed. The Reno draft does not even mention the applicable MFP for this area, let alone provide any of the required information about the plan.— Inasmuch as the draft reveals that no management program has yet been developed for areas the BLM concedes are in need of improved management, it is not surprising that no rationale for its selection is supplied. However, the draft does not even explain why the BLM was unable to develop a proposed management program for this area in the four years it has had since this EIS was scheduled. Lastly,

3 The latter assumption ignores the fact that what is a correctly tailored "fit" is a matter not of scientific certainty, but of great controversy.

3 Such information includes a description of the plan's contents and an analysis of its adequacy as a planning document.

15-7

Since there have been several public meetings concerning the MFP and EIS it was felt that including this section would be redundant and serve no purpose in the decision-making process.

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August 27, 1982
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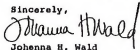
although the EIS suggests that the BLM has collected a great deal of data about the resources of the area, it also suggests that the data available are inadequate to allow management proposals to be developed and impacts to be predicted. Not just existing utilization data, but also SVIM data are rejected. The explanation offered for rejection of the available SVIM data is flimsy and contradictory on its face.¹⁵ The mere fact that there was "some inconsistency" in those data, Appendix 2, Section 2, p. 5-23, hardly constitutes an adequate reason for refusing to use the data to estimate carrying capacities on individual allotments and for wasting all the time, money and effort that went into obtaining them for that purpose.

In any case, Bureau officials have previously acknowledged that the grazing EIS's must contain data regarding the "present grazing capacity" of the areas involved in order to support "[p]roposed levels of livestock grazing." Affidavit of Paul Leonard (Jan. 10, 1978), filed in NRDC v. Andrus, *supra*, at 14, 15. See also CEQ Regulations, § 1502.22. This draft not only fails to provide any explanation for the lack of such data, it fails to provide any data which would support the proposal to maintain the last three years average use. On the contrary, the document concedes that at those use levels "[o]verutilization is occurring in 15 allotments." P. 3-9.

In conclusion, I submit that the Reno draft EIS fails to satisfy NEPA's requirements in fundamental respects. Unquestionably the Bureau can do better. Accordingly, I am hopeful that the deficiencies identified above will be remedied, notwithstanding the limited time remaining for completing this EIS. In any case, the Bureau would do well to recall that preparation of an inadequate statement will not satisfy the court's orders in NRDC v. Morton and NRDC v. Andrus.

Thank you in advance for your attention to these comments.

Sincerely,


Johanna H. Wald

¹⁵ If, in fact, the sampling techniques used "would tend to overestimate the production as often as it would underestimate the production," Appendix D. Section p, p. 5-23, the data should be used.

JWH:k1w



SIERRA CLUB

Tolyabe Chapter - Nevada and Eastern California

PLEASE REPLY TO:

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August 30, 1982

Tom Owen, District Manager
Carson City BLM
1050 E. Williams Street, #335
Carson City, NV

Dear Manager Owen,

I am writing in regard to the Reno Grazing EIS as the chairman of the Great Basin Group of the Tolyabe Chapter of the Sierra Club. Our group has over 800 members in the Reno-Sparks-Carson City-Fallon area who are keenly interested in the Reno Resource Area and its management.

I'll keep my comments as brief as possible as I'm in full accord with previous Sierra Club comments submitted on this EIS. On reviewing the document, I found it to be poorly written and very difficult to understand. The formats of the tables were confusing and many tables seemed useless or redundant. (Personally, I would favor more "visual" tables such as graphs which can be easily understood and require less study to arrive at the same information.) Many of our members have attended NRP planning workshops in Carson City on this resource area, but there is little evidence that our input is actually used in the EIS.

The alternatives are not substantially different from the Proposed Action. The main proposal in the PA as far as I can discover is the categorization of allotments into Maintenance, Improvement, and Adversely Affected. The real problem--livestock overgrazing--is not addressed by any of the alternatives, except the resource protection one. I would support this one except for the continuing negative impacts projected for riparian areas and wildlife. Quite frankly, I do not believe that any alternative proposed actually "protects the resource".

I could find no valid reason why BLM does not analyze a no livestock grazing alternative. The entire purpose of the EIS is to discover the relative impacts of a wide range of alternatives. To exclude one of the more critical analyses, such as you have done, greatly diminishes the value of the document. The reader which presumably includes the Manager, is precluded from having this important information when making decisions on grazing.

The DEIS is written as if this RA did not include a metropolitan area with over 200,000 urban residents. The typical urbanite

To explore, enjoy, and protect the natural mountain areas...

doesn't even ranch on the weekends! However, they do use the nearby public lands for recreation including hunting and fishing, hiking and backpacking, wildlife observation and photography, camping, wildflower observation, etc. Yet, the Reno DEIS still treats livestock grazing as the dominant use and attempts to justify it with the statement (pg 2-23) "...within the urban populations, the livestock industry is sympathetically viewed by area residents." While BLM staff may have talked to Sierra Club members, they must not have asked the right questions or recorded the answers fully, for the analysis reflects little understanding of our use and concerns about the public lands.

First, the Sierra Club is a national and state organization, but we're also local. Our membership, local, state and national far outnumbers ranchers and wildhorse and burro groups, contrary to the statement on page 2-24.

Second, although we are certainly a conservation organization, our equally strong interest in outdoor recreation is well-known, except apparently by the DEIS authors! As a local conservation and recreation group, we do have a very positive attitude toward wildlife, but an often negative attitude towards the part of the livestock industry which is abusing the public lands. We also have a negative attitude towards the Bureau's defective grazing management policies which are not only perpetuating the abuses of overgrazing by lack of proper management, but also proposing to institutionalize overgrazing in the Reno EIS area by officially rejecting its best available data to adjust grazing to the carrying capacity of the range.

Totally farfetched is the statement on page 3-6 that "...fencing riparian habitat could be a barrier to the recreationalists movement on horseback or foot." I find it hard to believe that the author of this statement has ever tried to camp or hike or ride on the public lands. Most springs and streams on BLM lands are fouled and trampled. Finding potable water is sometimes a critical survival exercise. Fencing isn't the problem. The lack of fencing negatively impacts recreation.

In short, I found the Reno DEIS essentially uncredible and fairly useless. If I didn't know the Carson City District staff and hadn't seen the quantity of data already collected on the Reno Resource Area, I'd have to believe from the DEIS that BLM knows nothing much about the problems of the Reno Resource Area or how to solve them. Perhaps this DEIS should be rewritten to reflect a proper proposed action, a reasonable range of alternatives and a professional analysis of their impacts on the Reno Resource Area.

Sincerely,
Dennis Ghiglieri
Dennis Ghiglieri
Great Basin Group Chair

HEARING COMMENTS

Three persons testified at the public hearings, their comments have been responded to below or in their written comments.

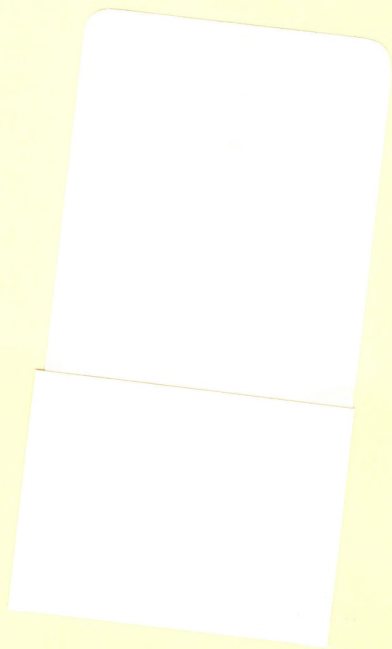
- 111
- T-1 (Marjorie Sill)
"I know this is a very important wildlife area and I know people are concerned about the deterioration of riparian habitat, but the proposed action does not do anything about the deterioration...."
- T-2 (Marjorie Sill)
"...one of the things that I have a lot of input into was the proposed ACEC in the Virginia Mountains and I see none of these particular things addressed. When it was decided that the Virginia Mountains did not qualify as a wilderness study area, we felt it did."
- T-3 (Marjorie Sill)
"I presume that is mostly what they are because most of us do not have the money to buy ranches as tax writeoffs, and therefore, you are not talking about people in the main who are earning their living through livestock production."
- T-4 (Ed Smith)
The DEIS gives the indication that no reductions (other than adjusting to the three year average use level) will occur until monitoring at this level during the short term process that adjustments are warranted."
- T-5 (Ed Smith)
"...., page one and page 1-4 indicate that adjustments will occur immediately following the completion of the EIS to allotments where studies demonstrate poor ecological condition downward trend, and excessive utilization."
- T-6 (Rose Strickland)
"...continued overuse of unprotected riparian habitat by livestock in our wild horses causing a decline in vegetation quality."

HEARING RESPONSES

- T-1 Marjorie Sill
The proposed action does state on page 1-1 that one of the problems is unprotected critical mule deer winter range, and on page 1-4 the proposed management action is to fence 23 miles of mule deer habitat so that it can be protected. Analysis of habitat protection projects are discussed in pages 3-5 to 3-6 of the DEIS. As long as the proposed management actions are implemented, riparian habitat will improve; if not, then it will continue to deteriorate as stated on page 3-25 regardless of the alternative.
- T-2
The BLM is required by regulation to consider ACECs and wilderness through the planning system. Since this document concerns itself with the impacts of grazing on the vegetation resource, those resources not significantly impacted or otherwise covered through standard operating procedures or other regulations are not discussed. These particular issues will be considered as part of the land use decisions along with other resource values.
- T-3
Refer to DEIS pages 2-22 and 3-23.
- T-4 Ed Smith
This reference to adjustments in use on page one of the Summary is under a heading labeled "Areas of Controversy", and is there for that reason.
- T-5
The reference to adjustments in use on page 1-4 of the DEIS states that CRMP would begin and possible adjustments in livestock use could result. As for which allotments would be affected, Table 1-9, page 1-17 shows a recommended implementation priority for Category 1 allotments. The degree of adjustments is not known at this time. However, if current study results were implemented, adjustments for Category 1 allotments would be as shown in Table 1-78, Chapter 1 Errata.
- T-6 Rose Strickland
This statement was included under the section called "Unavoidable Adverse Impacts". Unless riparian habitat is protected as suggested by each alternative, deterioration will continue.

Also refer to Responses 2-10.

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